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ENVIRONMENTAL, HEALTH & SAFETY COMPLIANCE SPECIALISTS

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THE EHS COMPLIANCE MANAGEMENT PROGRAM

U.S. ENVIRONMENTAL PROTECTION AGENCY NATIONAL POLLUTION DISCHARGE ELIMINATION SYSTEM (NPDES: 40 CFR Part 122)

STORM WATER RUNOFF PROGRAM

This document was processed using Year 2001 Compliant Technology

PREPARED FOR

ARROW GEAR COMPANY
2301 CURTISS STREET
DOWNERS GROVE, IL 60515

Revision Year: 2001

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Minneapolis/St. Paul · Oklahoma City · Phoenix · St. Louis · Tulsa · Wichita

August 28, 2001

Dave Reis
Chief Metallurgist
Arrow Gear
2301 Curtiss St.
Downers Grove, IL 60515

Re: Storm Water Pollution Prevention Plan (SWPPP),
20001 Revision

Dear Dave:

Enclosed please find the updated Storm Water Pollution Prevention Plan (SWPPP) for your facility. You and your staff should be commended on the outstanding storm water pollution prevention efforts that are underway at the site. The level of cleanliness and the structural storm water controls at the facility are excellent and promote the minimization of storm water pollution.

In order to continue the outstanding implementation of storm water pollution prevention efforts, please complete each of the steps listed below:

- Review and familiarize yourself with the SWPPP.
- Sign and date the plan in the appropriate places (indicated by yellow tabs).
- Sign, date and mail the Annual Facility Inspection Report located on the inside cover of the SWPPP binder.

As the Arrow Gear continues to enhance environmental, health, and safety programs, Vanguard stands ready to provide any assistance necessary. It has been Vanguard's pleasure to serve your company and we look forward to an ongoing business relationship. Should you have questions, comments, or require additional information regarding your site's NPDES permit or any of the SWPPP requirements, please feel free to give me a call at (918) 641-5588.

Best Regards.

Jason White
Environmental Manager
Vanguard Environmental, Inc.

"Total Quality Environmental Management"
Turn-Key Compliance . . . . Nationwide

Signed & Mailed 9-24-01

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SECTION 1

1

PLANNING AND ORGANIZATION

1.0 Pollution Prevention Plan Team and Responsibilities

The goal of this Storm Water Pollution Prevention Plan (SWP3) is to control the discharge of pollutants, which may potentially emanate from the Arrow Gear facility, located at 2301 Curtiss Street in Downers Grove, IL into storm water. The Arrow Gear Pollution Prevention Team has been formed to develop and implement the facility's SWP3. The Team is responsible for: implementing all general permit and SWP3 requirements, defining and agreeing upon appropriate objectives for the facility's storm water management program, maintaining awareness of any change in plant operations which may require changes to the facility SWP3, maintaining clear lines of communication with facility management, and ensuring a cooperative working relationship.

1.1 Pollution Prevention Plan Team Members

The Pollution Prevention Team consists of the following personnel:

Team Member	Name	Emergency Phone	Title
Team Leader	Dave Reis	(708) 771-7281	Chief Metallurgist
Member #1	Ron Kauzlarich	(630) 985-1303	Facility Manager
Member #2	Jim Walker	(815) 439-3580	Turning & Milling Supervisor
Spill Prevention Coordinator	Mike Cervinka	(630) 416-0253	Executive Assistant

Pollution Prevention Team meetings will be held periodically to:

- Evaluate existing company environmental management plans, and determine which of those can be consolidated into the SWP3.
- Review good housekeeping and spill prevention and response procedures.
- Discuss and plan upcoming employee training sessions.
- Discuss and review any environmental, health, or safety incidents.
- Announce any new management or operational practices, which may affect the SWP3.

1.2 Team Member Responsibilities

Responsibilities and duties of the Team Members are:

Team Member	Responsibilities
Team Leader	* Understand the SWP3, and assure facility's compliance. * Administer the program. * Assure training of team members/employees as to goals/procedures of the SWP3.
Member #1	* Understand and follow the SWP3. * Member of the Spill Response Team. * Fill in for the team leader in event of absence. * Conduct monthly visual inspections. * Follow up on inspection discrepancies and make needed repairs. * Maintain all records pertaining to SWP3.
Member #2	* Understand and follow the SWP3. * Member of the Spill Response Team. * Fill in for the Member #1 and/or Team Leader in their absence. * Insure monthly visual inspections are conducted. * Insure inspection discrepancies are addressed.
Member #3	* Understand and follow the SWP3. * Conduct weekly inspections of chemical inventory. * Insure that all chemicals are labeled and stored correctly. * Member of the Spill Response Team.
Spill Response Coordinator	* Establish emergency procedures to isolate, contain, and clean up spills & releases of Section 313 Water Priority Chemicals and other substances. * Establish and implement reporting procedures for spill & release incidents.

SECTION 2

2

Assessment

Overview

Arrow Gear is classified under SIC Code 3566 (Speed Changers, Industrial High Speed Drivers, and Gears). The company manufactures a variety of products including speed changers, reducers, power transmission and high precision gears. The Arrow Gear products are used by various industrial sectors, aerospace organizations, and the military. The site utilizes a variety of industrial processes. The machining and associated metal working processes are the primary sources for potential pollutants.

Located in a primarily industrialized area, the Arrow Gear site has multiple storm water management structures that minimize storm water pollutant discharge. During the Vanguard site visit conducted on August 23, 2001, housekeeping practices were reported to be good and storm water Best Management Practices (BMPs) were being actively implemented by facility management and staff.

2.0 Potential Pollutant Sources

2.0.1 Site Drainage

A map of the facility has been prepared, which depicts storm water outfalls (sampling and/or monitoring points), potential pollutant sources, and drainage patterns on facility property. This map, in addition to a topographic map showing the facility location, can be found in **Appendix A**. Any structural storm water control measures, locations of past significant spills or releases, nearby water bodies, discharge flows with significant potential for causing soil erosion, and locations of exposed "significant materials" or industrial activities, if present, are shown in this map.

2.0.2 List of Significant Materials

An inventory of significant materials exposed to storm water was taken on August 23, 2001. Included in this plan are a Table of Significant Materials Exposed to Storm Water (Sec. 2.1.1) and a Pollutant Source Identification Table (Appendix B), which quantify and locate those respective itemized materials. Exposed significant materials consist of:

- Raw materials (steel, forgings, and slugs);
- Scrap metal;
- Empty drums (solvents and oils);
- Wooden pallets and crates;
- Industrial trash compactor;
- Plant vehicle traffic;
- Oil sorbent dumpster.

2.0.3 Materials Exposed To Storm Water In The Past Three Years

Materials exposed during the past three years are consistent with the materials listed in Section 2.0.1.

2.0.4 Loading and Unloading Activities

Loading docks are located on the north and west side of Building #1. Portions of Building #2 are used for warehousing and the remaining portions are sub-leased. Two loading docks are located at the east end of Building #2. Both of the primary loading docks are located on the north end of Building #1. These primary loading docks are covered to prevent storm water contamination during loading and unloading processes (Refer to the SWP3 Layout in **Appendix A**.).

2.0.5 Facility Process Areas

Involved in manufacturing high precision gears, the site performs all manufacturing processes within the confines of Building #1. Process areas or departments in this building involving primary machining operations include sawing, lathing, milling, broaching, deburring, grinding (I.D. and O.D.), gear cutting, and lapping. Processes

associated with the manufacture of gears include steam cleaning, blasting, natal etching, heat treatment and gear box assembly.

2.1 Method and Location of Storage Areas

West Storage Area of Building #1

The site has two side-by-side storage enclosures adjacent to the west side of Building #1. The far west enclosure is used to store steel forgings and used oil sorbent (in a lidded dumpster). The storage area immediately next to Building #1 contains new wooden crates and skids, steel forging tubs staged for vendor return, used wood pallets and crates staged for disposal, and a 3000 gallon above ground storage tank (AST) that contains nitrogen. There are also two steel sheds within the fenced areas used for storing drums of oil, solvents and coolants.

Indoor Storage Area of Building #1

On the north side, approximately 160 feet from the west end of Building #1 is the shipping and receiving dock. Located in the truck well of an adjacent dock is a scrap trailer designated for the collection of metal chips. Three tanks (480 gallons per tank) used for storage of waste oil, coolant, and sludge are stored along with a tank used to store mineral spirits (580 gallons) on the east side of the trailer. Approximately 25 metal drums of oil and solvent are located near the south end of the dock.

West Storage Area of Building #2

Empty steel drums used for disposal are stored within a fenced enclosure physically contiguous with the west side of Building #2. West of the fence is a 20 cubic yard, open topped, scrap steel dumpster. Foundations of all storage areas are constructed of appropriate paving materials.

2.1.1 Significant Materials Exposed to Storm Water

DESCRIPTION OF EXPOSED SIGNIFICANT MATERIAL					Completed by: Jason White Title: Environmental Manager Date: August 23, 2001
Instructions: Based on your material inventory, describe the significant materials that were exposed to storm water during the past three years and/or are currently exposed.					
Description of Exposed Significant Material	**Period of Exposure**	**Quantity Exposed (units)**	**Location (As indicated on the site map)**	**Method of Storage or Disposal (e.g., pile, drum, tank)**	**Description of Material Management Practice (e.g., pile covered, drum sealed)**
Raw material (steel)	Continuous	Multiple piles	Throughout facility yard	Stored in crates and bins.	Stored over impervious ground cover to minimize sedimentation/erosion
Scrap metal	Continuous	1 Dumpster	West side of building #2.	Dumpster	Stored over impervious ground cover to minimize sedimentation/erosion. Dumpster is covered with a tarp when materials is not being transferred.
Drums and other containers	Continuous	Variable	Storage area on the west side of the site.	Stored in metal storage sheds.	Storage containers remain closed when material is not being transferred.
Used oil sorbent dumpster	Continuous	Dumpster (closed lid)	Storage area on the west side of the site.	Stored in dumpster over concrete.	Stored over impervious ground cover to minimize sedimentation/erosion Dumpster lid remains closed when material is not being transferred.
Industrial trash Compactor	Continuous	1 Compactor	South side of facility	Dumpster	Stored over impervious ground cover to minimize sedimentation/erosion
Wooden pallets	Continuous	Variable	Throughout facility	Stacked	Stored over impervious ground cover to minimize sedimentation/erosion
Powered industrial vehicle traffic	During working hours		Throughout facility	NA	Preventive maintenance program

2.2 Material Management Practices

Concerted efforts have been made to reduce outside storage of finished goods, raw materials, inactive/obsolete equipment, and waste material. All shipping and receiving activities are performed at the loading docks except for the disposal of waste or recyclable materials. The loading of used wood pallets and crates and the hauling of scrap steel, empty drums, and used oil dry are conducted outside.

Hazardous and process materials are stored in sealed containers in the metal sheds located west of the Building #1. The oil dry waste dumpster is serviced on an as-needed basis. The dumpster is lidded and maintained in a closed condition except when waste oil sorbent is being transferred. Transfer activities are minimized during rainfall events. Scrap steel is stored in an open-topped dumpster located west of Building #2. Metal chips are accumulated in a trailer stored inside adjacent to the main shipping and receiving dock. Metal scrap is picked up on a weekly basis by a recycling contractor. Facility trash is compacted on-site and picked up every 3 to 4 weeks by BFI Industries.

2.3 Material Treatment Practices

No treatment practices occur at this facility. Industrial waste disposal contractors are used to dispose of all waste generated at the site.

2.4 Structural Control Measures

Consisting of approximately 13 acres, the site has approximately 3.34 acres covered by buildings or other structures and approximately 4.43 acres covered in parking lots, docks, and sidewalks. The majority of the property is covered with impermeable paving materials. The site also has vegetation that is well maintained and used to minimize erosion.

Other structural control measures include roof drains, down spouts, and direct runoff to surface collection drains. Collection drains, stone spillways and underground drainage conduits channel storm water to St. Joseph Creek. A storm water retention area is also used to collect storm water from various areas of the site. The effluent from this retention pond enters St. Joseph Creek through underground conduits (i.e., Outfall 1 and 2). Discharges from the north parking, Manufacturing Building #1, and its associated roof discharges exit the property as indicated on the Facility SWPPP Layout through openings in the parking curb (Outfalls #3 and #4) and underground conduits terminating in Outfalls # 5, #6 and #7. Discharges originating from the eastern portion of the Manufacturing Building #1 perimeter and parking lot are directed to

Outfalls #8, #9 and #10 by an earthen berm control structure and the parking lot grading. Discharges associated with Outfall #11 originate from the empty drum and scrap steel dumpster storage areas and Building #2 roof, perimeter, and loading docks. All above ground storage tanks are double walled to provide secondary containment.

2.5 Non-Structural Control Measures

Non-structural control measures consist of regular visual inspections of storage areas and storm water outfalls. performance of general good housekeeping practices, and periodic removal of trash and scrap material (as applicable).

2.6 Spill/Leak History

No significant spills or leaks have occurred at the facility in the past three years. The form, List of Significant Spills and Leaks, can be found in Appendix B.

2.7 Non-Storm Water Discharge Certification

Non-storm water discharges can be process water, air conditioner condensate, non-contact cooling water, and connections to the city storm sewer system, ground water seepage, vehicle and/or other wash waters, or sanitary wastes.

An evaluation for non-storm water discharge was conducted at the facility on August 23, 2001. The method used for this evaluation was visual inspection. The evaluation consisted of:

- Inspection of all storm water outfall locations.
- Inspection of all building perimeters.
- Inspection of all outside storage locations.
- A check for the presence of natural springs on the topographic map for the facility area.
- A walking survey of the property was conducted.

During the walking survey, no groundwater seepage was observed, and it was determined that the amount of air conditioning condensate does not cause significant runoff. To the best of facility management's knowledge, there are no illicit connections to the city storm sewer system. Based upon the visual inspection and other information provided at the time of the site visit, it

was concluded that there are no significant non-storm water discharges into the storm water runoff system. A Non-Storm Water Discharge Assessment and Certification Form are included with this document and are located in **Appendix D**.

2.8 Storm Water Monitoring Data

Storm water monitoring has not previously been conducted.

2.9 Site Evaluations and Risk Identification

DESCRIPTION OF SIGNIFICANT ACTIVITIES							Completed by: Jason White Title: Environmental Manager Date: August 23, 2001
Instructions: Based on your material inventory, describe the significant activities/materials that were exposed to storm water during the past three years and/or are currently exposed.							
		Potential Pollutant					
Activity/Material	**Risk Factor** (Low, moderate, high)	Total Suspended Solids (TSS)	Oil & Grease (O&G)	Metal & Metal Oxides	Petroleum Residue	Antifreeze and/or Hydraulic Fluid	Other (Describe)
Raw Materials (steel)	Moderate			X			
Scrap Metal	Low			X			
Drums	Low		X		X		
Used Oil Sorbent	Low		X		X		
Industrial Trash Compactor	Low	X	X	X	X		Other Organics
Wooden Pallets	Moderate	X					
Powered Industrial Vehicle Traffic	Moderate	X	X	X	X	X	

SECTION 3

3

BMP SELECTION AND PLAN DESIGN

3.0 Measures and Controls

The United States Environmental Protection Agency (USEPA) has identified baseline Best Management Practices (BMPs) which must be used to minimize storm water pollution. These are:

A. Good housekeeping.

B. Preventive maintenance.

C. Visual inspections.

D. Spill prevention and response.

E. Sedimentation and erosion prevention.

F. Traditional storm water management practices.

G. Other BMPs as appropriate.

H. Employee training.

I. Record keeping and reporting.

3.1 Good Housekeeping

Good housekeeping practices are designed to maintain a clean and orderly work environment. Generally the best method to prevent pollution in storm water is using common sense to improve the facility's basic housekeeping methods. The following have been, or will be implemented:

- Implement careful material storage practices.
- Improve operation and maintenance of industrial machinery and process.
- Maintain up-to-date material inventory.
- Identify all chemical substances present in the workplace.
- Label all containers showing name and type of substance, stock number, etc.
- Schedule routine cleanup operations.
- Maintain well-organized work areas.
- Train employees about good housekeeping practices.

3.2 Preventive Maintenance

A preventive maintenance program has been developed consisting of inspections and maintenance of storm water management devices. This program also includes routine inspections of facility operations to detect faulty equipment, tanks, vessels, etc. This equipment will be checked regularly for signs of wear and deterioration. The Preventive Maintenance Program will consist of the following:

- Inspection and testing facility equipment and systems to uncover conditions that could cause breakdowns or failures resulting in discharges of pollutants to surface waters. Ensuring appropriate maintenance of such equipment and systems.
- Any rolling vehicles used at the site are visually inspected daily for signs of leaks. If leaks are detected, the vehicle is taken out of service until repairs are made.
- All used fluid storage containers are to be labeled.
- All liquid chemicals are accepted for use at the site only if containers are properly labeled.
- Above ground liquid storage containers are to be labeled as to contents.
- Areas are designated for unloading of materials if possible.
- Clean up any fluid spills immediately upon discovery.
- Pick up debris from site at least weekly.
- Keep a generally clean appearance throughout the site.

- Any equipment or product cleaning is done in a covered area if possible.

3.3 Section 313 Reporting Facility Preventive Maintenance Inspection Requirements

At this time there are sixteen (16) Section 313 Water Priority Chemicals in use at the site; however, the majority of these chemicals are constituents in metals and are virtually non-soluble. Nonetheless, the following must be observed.

- All areas of the facility where Section 313 Water Priority Chemicals are used, or stored, will be inspected daily for leaks or releases.
- Any leaks or releases will immediately be reported to the Spill Response Coordinator.
- Any conditions, which could lead to direct contact between storm water and raw materials, intermediate materials, waste materials, or products containing Section 313 Water Priority Chemicals, will also be reported to the Spill Response Coordinator.

A list of products at the facility containing Section 313 Water Priority Chemicals is located in **Appendix C**.

3.3.1 Areas To Be Inspected

These inspections will focus on, but not be limited to:

- Storage drums.
- Storage containers.
- Material handling equipment.
- Bulk material storage areas.
- All sources of potential pollutants identified above.

It is the job of the Pollution Prevention Team to ensure that problems found during inspections are corrected and changes are made to the SWP3 to prevent those problems from occurring in the future. Written documentation of corrective action should be included with the plan when such activity is completed.

3.3.2 Reportable Conditions Noted During Inspections

If any of the following are detected during the inspection, the Spill Response Coordinator will be notified immediately: leaks, releases, spills, corrosion of storage containers or tanks, support or foundation failure, or other signs of deterioration or non-containment of Section 313 Water Priority Chemicals. Any condition noted which may lead to releases of Section 313 Water Priority Chemicals will be corrected as soon as feasible.

3.4 Visual Inspections

A program of regular visual inspections has been established at this facility to ensure that all elements of the SWP3 are in place and working properly. This should help prevent pollution of storm water runoff. The following inspections will be performed at the designated interval, and the completed inspection checklists will be kept on file. Monthly Checklist forms are located in **Appendix F**. Additionally, more frequent and undocumented informal inspections will be performed. These inspections include:

- Monthly inspection of all operating equipment for leaks, worn hoses, and other areas of concern according to manufacturer's operations manual.
- Monthly inspection of used fluid containers.
- Monthly inspection of grounds for spills, clutter and items needed to be covered.
- Monthly inspection of all storm water management devices (dikes, berms, curbing, etc.).
- Monthly inspection of flammable liquid containers.
- Monthly inspection of storage areas for signs of pollution, or its potential.

3.5 Spill Prevention and Response Procedures

In areas where spills are likely to occur, all potential drainage points have been identified in the Storm Water Pollution Prevention Plan. Storm water outfall locations are marked on the SWP3 Layout in **Appendix A**. Employees are aware of response procedures, including material handling and storage requirements. Access to spill cleanup equipment will be provided at the facility where appropriate.

3.5.1 Spill Prevention Plan Considerations

- Installation of leak detection devices on storage tanks – when feasible.

- Adopt and implement good housekeeping practices.
- Performing regular visual inspections to identify areas of potential leaks or spills.
- Recycle, reduce, and reuse process materials to minimize waste on site.

3.5.2 The Spill Response Plan

The Spill Response Plan will consist of four parts:

1. Identification of the Spill Response Team.
2. Identification of safety measures.
3. Development of protocols to notify appropriate authorities in the event of a spill.
4. Identification of appropriate spill response measures.

3.5.3 The Spill Response Team

The members of the Spill Response Team are identified on the Pollution Prevention Plan roster located in Section 1.1. The Spill Response Coordinator may also designate additional personnel as needed.

3.5.4 Spill Response Safety Measures

Spill Response Safety Measures include:

- Notification – The Spill Response Coordinator, or a member of the Spill Response Team, is to be notified immediately upon discovery of a spill or leak.
- Awareness – Employees should not attempt a response until the substance and its dangers have been identified. The Spill Response Team will identify the hazards associated with the substance by consulting the product MSDS and/or container labels.
- Employee Safety – Employees will not attempt spill response or cleanup without using proper personal protective equipment (PPE). This information can be found on the product MSDS.

3.5.5 Spill Notification Protocol

Should a reportable spill occur, the Spill Response Coordinator or, in his absence, a member of the Spill Response Team will notify the following agencies:

Environmental Release Hotline:	**(800) 832-8224**
National Response Center (NRC):	**(800) 424-8802**
EPA Region V, 24-Hour Spill Hotline:	**(312) 353-2318**
Illinois State Emergency Response Commission (SERC):	**(512) 239-2507**
Du Page County Local Emergency Planning Committee (LEPC):	**(817) 884-1212**
Fire Department	**911**
Police Department	**911**

3.5.6 Spill Response Measures

The product MSDS identifies the appropriate procedures and materials to use for spill abatement and cleanup. Appropriate cleanup materials and equipment will be kept in areas where materials are handled or stored, and which have a high potential for spills (such as the loading\unloading area, and near the liquid storage drums).

In the event of a spill or release, the following measures will be taken:

- The identity of the substance will be determined. The MSDS will be consulted to determine:
  - Required personal protective equipment (PPE).
  - The manufacturer's suggested cleanup procedures.
  - Any hazards presented by the substance (reactive with water, etc.).
- If possible, the cause of the leak will be stopped (closing valves, moving a drum to the upright position, etc.).
- Contain the spill, do not let it spread or move from the immediate area. Keep substance away from floor drains. Use booms, absorbents, kitty litter, etc. to contain the spill.
- Notify the Spill Prevention Coordinator, a member of the Pollution Prevention Team, or a Supervisor.
- Clean up the spill using methods described in the product MSDS or other references.
- The Spill Prevention Coordinator (or in his absence a member of the Pollution Prevention Team) will determine if the spill/release is "reportable," and immediately notify the appropriate Regulatory agencies. **Agency telephone numbers are in Section 3.5.5**. The

Spill Prevention Coordinator will be responsible for follow-up calls and reports to Regulatory Agencies.

- Properly disposed of spilled/released substance and any cleanup materials (including impacted soil) according to Federal, State, and Local requirements.

3.5.7 Cleanup Requirements for Section 313 Water Priority Chemicals

In the event of a spill, leak, or release of a Section 313 Water Priority Chemical, any contaminated soil, material, or debris will be removed from the facility promptly and disposed according to Federal, State, and Local requirements. The Spill Response Coordinator will be responsible for spill cleanup, notification, and material disposal. A list of Section 313 Water Priority Chemicals present at the facility and the entire EPA Section 313 List are in **Appendix C**.

3.6 Sediment and Erosion Control

The following measures have been taken by the facility to control the potential for significant soil erosion:

- Significant portions of the property are covered with pavement.
- Gravel and/or pavement in high use areas will be well maintained.
- The site consists of storm water features such as curbing, guttering, drainage ditches etc.

3.7 Waste Handling/Recycling

Scrap steel is hauled off on a weekly basis by the Cozzi Company. Trash is compacted in a closed container and hauled every three-to-four weeks by BFI. Used oil is removed from the facility and recycled by Beaver Oil every three weeks. Other wastes, including hazardous wastes, are recycled by Pollution Control Industries.

3.8 Storm Water Management Practices

The following storm water management practices have been implemented or are being evaluated by facility management for their effectiveness and feasibility in consideration of implementation.

- Conduct loading and unloading under cover when possible.

- Maximize indoor and covered storage of raw materials.
- Evaluate the tarping of or construction of stationary covers for equipment/product/ materials stored outside.
- Confine storage of materials, parts, and equipment to designated areas.
- Insure all industrial areas are kept clean and free of excess debris.

3.9 Additional BMPs

The following additional BMPs are also being evaluated for possible implementation.

- An all employee program to insure that all items are cleaned and free from petroleum residues or other water contaminating, foreign materials prior to outside storage.
- Conduct all fabrication/manufacturing activities inside, as applicable.
- Ensure forklift and equipment operators are properly trained to help prevent spills and drum punctures.

3.10 Additional Spill Prevention Measures

There are no additional spill prevention measures.

SECTION 4

4

IMPLEMENTATION

This section outlines how the selected BMPs will be implemented and how employees will be trained to ensure the success of the Plan.

4.0 Implementing Appropriate Storm Water Runoff Controls

The implementation of appropriate storm water runoff controls and BMPs will consist of three components:

1. A schedule for implementation will be decided upon by the Pollution Prevention Team. Some of the measures may be put into action immediately; others will be phased in.

2. The Pollution Prevention Team will determine which individuals (or teams) will be responsible for implementing aspects of the Plan, monitoring, or inspections.

3. Assurance that facility management is aware of, and has given approval for, the implementation schedule and strategy. A representative of the Pollution Prevention Team will provide progress reports to facility management.

4.1 Employee Training

The Team Leader of this program shall be responsible for training employees to include safe handling of materials, spill prevention and response, and good housekeeping. The training will be conducted on an annual basis. The Team Leader will also train members of the Pollution Prevention Team on their storm water responsibilities.

As a minimum requirement, new employees will be trained in the general areas of this program. The training for new employees may be on-the-job training, films, or any other type of training that enables the new employee to become familiar with this program.

Employees working in operations associated with hazardous areas and/or processes will have training based on the specific working environment. The minimum standards (given below) will

be instituted for the area. The training program will be upgraded on a periodic basis in order to keep employees safe and healthy and minimize potential environmental impacts associated with company processes.

The following are among the minimum standards for working in the area described:

- Management will be involved in all areas. They will also be involved in the implementation of these standards. Management will have an active role in safe daily operations, spill response, proper removal of spilled materials, handling and the safe use of materials, erosion control, and preventing impacted storm water from leaving the property.

- Maintenance personnel will have a major role in this program beginning with preventive maintenance on all machinery, tools, and equipment. Maintenance personnel will also be involved in the inspection and routine maintenance of storm water management devices, as well as inspections of facility operations to detect faulty equipment.

- Employees that will have an active role in SWP3 implementation include, but are not limited to: production staff and general help, quality control, maintenance, shipping and receiving, and spill response personnel.

4.2 Training Topics

The training program will emphasize the following topics.

Good Housekeeping

- Review basic cleanup procedures (i.e. sweeping, oil cleanup, trash pickup, etc.).

- Clearly indicate proper waste disposal locations for each type of refuse.

- Post and review good housekeeping signs in material handling areas (if possible) and remind employees of their intent.

- Inform employees where routine cleanup equipment is stored.

Spill Prevention and Response

- Clearly identify potential spill areas and drainage routes.

- Familiarize employees with past spill incidents; explain why they happened and the resulting environmental impact.
- Post warning signs with emergency contacts and information in potential spill areas.

- Inform employees who the Spill Response Coordinator is, and identify the Spill Response team members.
- Practice spill cleanup procedures.
- Post the location of spill cleanup equipment and the person(s) responsible for its operation.

Material Handling and Storage

- Inform employees as to which materials are hazardous, where they are stored or used, and how to locate and read the MSDS.
- Review the importance of container labeling.
- Stress the importance of rotating stock (using the oldest first).
- Explain recycling practices in order to minimize storage requirements.
- Explain how to properly dispose of materials that are unusable and not needed.
- Demonstrate how to keep valves tightly closed and drums securely sealed.

4.3 Refresher Training

Refresher training will be conducted at the least annually, as required by the permitting requirements, and will include information on the following topics.

- Good Housekeeping.
- Spill Prevention and Response Procedures.
- Material Handling and Storage.

4.4 Recordkeeping and Reporting Procedures

The following documents will be maintained at the Arrow Gear facility.

- Completed Monthly Checklist forms.
- Reports of corrective actions taken as a result of inspections.

- Reports of all spills, leaks, and discharges.
- Preventive maintenance checklist and repair reports.
- Records of visual storm water sampling results.
- Employee Training Records.

A copy of the Monthly Inspection Checklist form is located in **Appendix F**. A copy of the Employee Training Record form is located in **Appendix G**.

SECTION 5

5

PLAN EVALUATION

The effectiveness of the Pollution Prevention Plan will be evaluated at regular intervals. The Pollution Prevention Team in conjunction with facility management will perform these evaluations. In general, the effectiveness of the Plan will be based upon results of the facility assessment (see **Section 2**), controls, and BMPs, which have been implemented.

5.0 Annual Site Compliance Evaluation

At least once per year, the Pollution Prevention Team (and other qualified personnel) will conduct a Site Compliance Evaluation. The Compliance Evaluation will include:

- An inspection of storm water drainage areas for evidence of pollutants entering the drainage system.
- The effectiveness of implemented BMPs will be evaluated. For example:
  - Is the facility cleaner?
  - Are employees familiar with, and practice good housekeeping measures?
  - Do employees know the spill prevention and response procedures?
- Sediment controls, structural measures, and other BMPs will be observed during a storm event in order to evaluate their effectiveness.
- A visual inspection of equipment needed to implement the SWP3, such as spill response equipment, shall be made.
- All visual observation records, inspection records, and sampling and analysis results.

- Revision of the Storm Water Pollution Prevention Plan as needed based upon the Site Compliance Evaluation. Revisions of potential pollution sources and measures and controls must be completed within two (2) weeks after the completion of the evaluation. Implementation of any changes to the SWP3 shall be made in a timely manner, but in no case more than twelve (12) weeks after the inspection.

- A report summarizing the results of the Compliance Evaluation and any follow-up actions. This report will include:

  - The scope of the inspection.

  - The date of the inspection.

  - Personnel who conducted the inspection.

  - Major observations relating to the implementation of the SWP3.

  - Necessary SWP3 revisions.

  - A schedule for implementing SWP3 revisions.

  - Any incidents of non-compliance and the corrective actions taken.

  - A summary of the required monthly and quarterly visual inspections.

  - A certification that the facility operator is in compliance with the General Permit.

This report will be retained as part of the SWP3 for at least (3) years, signed, and certified.

If the report does not identify any incidents of non-compliance, a certification should accompany the report verifying that the facility is in compliance with the Pollution Prevention Plan and the permit. When the Pollution Prevention Team determines violations of the permit have taken place, a written report of all instances of non-compliance must be compiled including:

- The suspected duration of non-compliance.

- The actions taken to rectify the non-compliance.

- Measures implemented to insure there will be no recurrence.

This report will be maintained with the Plan and kept on file for a minimum of three years (3) after expiration of the current permit.

5.1 Recordkeeping

Records of spills, leaks, inspections, and maintenance activities will be kept on-site for at least three (3) years after the expiration of the permit. Spill and leak information will include the time and date of the incident, weather conditions, cause, amount spilled/leaked, cleanup measures taken, any resulting environmental problems, and copies of all correspondence with regulatory agencies concerning the incident. Records of all storm water monitoring information and copies of all reports will be retained for a period of at least three (3) years after coverage under this permit terminates. These records will include:

- The date, place, and time of site inspections, sampling, visual observations, and/or measurements.
- The individual(s) who performed the site inspection, sampling, visual observations, and/or measurements.
- The date and approximate time of analysis.
- The individual(s) who performed the analysis.
- Storm water discharge visual observation records.
- Visual observation and sample collection exception records.
- The records of any corrective actions and follow-up activities that resulted from the visual observations.
- Any analytical monitoring that is required. Along with this data, records including all calibration and maintenance records of instruments used for analysis shall be retained.
- Records of all data used to complete the Notice of Intent to be covered by this permit.

Records of all monitoring information collected during the term of this permit must be kept for a period of three (3) years after the expiration of the permit.

6

GENERAL REQUIREMENTS

6.0 Plan Revisions

The Storm Water Pollution Prevention Plan will be modified if there are major changes in the facility design, construction, operation, or maintenance, which will affect storm water runoff outfalls, quality, or composition. As required, this plan will be revised and changes implemented in a timely manner, but in no case more than thirty (30) days after a facility operator determines that the SWP3 is in violation of any requirement(s) of the General Permit.

6.1 Required Signatures

As required, an "authorized representative" who is a person involved in company management and has the authority to sign and certify this type of document must sign this Plan.

6.2 Plan Location

This Plan and records will be kept at the Arrow Gear facility located at 2301 Curtiss St. in Downers Grove, IL. The Plan and records will be maintained for at least three (3) years after the expiration of the permit.

6.3 Plan Certification

The Plan Certification is located on the following page.

Authority Certification Signature

I certify under penalty of law that this document and all attachments were prepared and under my direction or supervision, in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

_____ _____

Signature Date

Dave Reis, Chief Metallurgist

Printed Name/Title

7

SPECIAL REQUIREMENTS

Per EPA Multi-Sector General Permit and Illinois NPDES General Permit requirements, some facilities may be subject to additional storm water discharge requirements. Affected facilities include those that: discharge storm water through a Municipal Separate Storm Sewer System (MS4), file EPCRA Section 313 Reports, or have salt storage piles on-site.

7.0 Discharge Through Municipal Separate Storm Sewer Systems

Arrow Gear facility discharges storm water directly to St. Joseph Creek. This site does not discharge water to any Municipal Separate Storm Sewer System.

7.1 EPCRA Section 313 Reporting Facilities

To date, this site had not been required to submit Form R reports. Although the site handles several Section 313 Water Priority Chemicals, no Section 313 reporting thresholds have been exceeded.

7.2 Salt Storage Piles

There are no salt storage piles at this facility.

8

MONITORING REQUIREMENTS

8.0 Monitoring Requirements

This facility conducts operations classified by SIC Code 3566 (speed changers, industrial high speed drives, and gears). The facility is permitted to discharge storm water in accordance the Illinois EPA NPDES Permit No. ILR005775.

Under this permit, monitoring requirements for SIC Code 3566 consist of visual monitoring at each representative storm water outfall for the entire term of the permit. Because of the similarity in operations in most areas of Manufacturing Building #1 which would constitute nearly identical effluent characteristics, several of the outfalls are duly representative of other nearby outfalls. Outfall #2 is considered to be representative of the discharge of Outfall #1; Outfall #4 representative of Outfall #3; Outfall #7 representative of Outfalls #5 and #6; and Outfall #9 representative of Outfall #8. Therefore, Outfalls #2, #4, #7, #9 and #10 require visual monitoring and respective documentation during the entire term of the permit. If substantive changes in the methods or scope of operations at the facility are implemented and it is believed the represented outfalls are no longer representatively similar to the currently monitored outfalls, then the SWPPP must be amended and sampling begun at those outfalls substantively changed.

8.1 Quarterly Visual Storm Water Sample Evaluation

Storm water drainage will be inspected for evidence of pollutants. Quarterly visual evaluation of representative storm water samples will be performed at Outfalls #2, #4, #7, #9 and #10. A manual sampling procedure will be used to collect storm water at each outfall. This will require the Pollution Prevention Team Leader (or Member) to be present during the storm event to manually collect the sample(s). The sample(s) should be collected within the first thirty minutes of the beginning of the storm event and visually evaluated for the required parameters. If collection of the grab sample within the first thirty minutes is impractical, then the grab sample may be taken within the first hour of the discharge. The quarterly periods are defined as:

- January – March
- April – June
- July – September
- October – December

Detail instructions for collecting samples and the form used to record the evaluation results are. provided in Appendix H.

Reports of the visual evaluations are not to be submitted to the State. They must be kept on file with the plan. The visual examination report includes: the examination date and time, examination personnel, visual quality of the storm water discharge, and probable sources of any observed storm water contamination. The report must be maintained with the Pollution Prevention Plan. No analytical evaluation is required on these samples.

8.2 Analytical Monitoring

According to the Illinois EPA NPDES Permit No. ILR005775, Arrow Gear Company is not required to conduct analytical monitoring at this time.

APPENDIX A

Appendix A

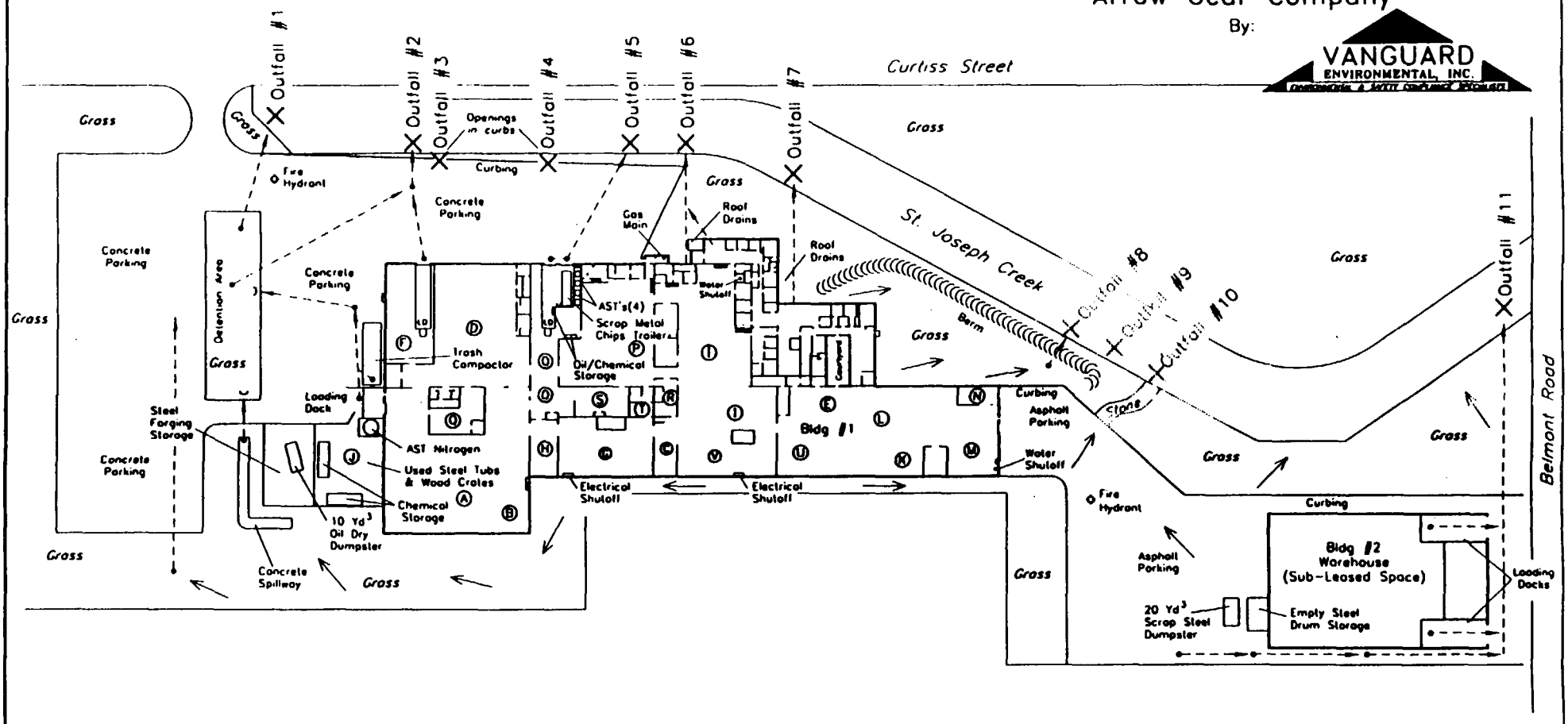
SWP3 Layout

Street Map

Area Topographic Map

Arrow Gear Company

By: VANGUARD ENVIRONMENTAL, INC.



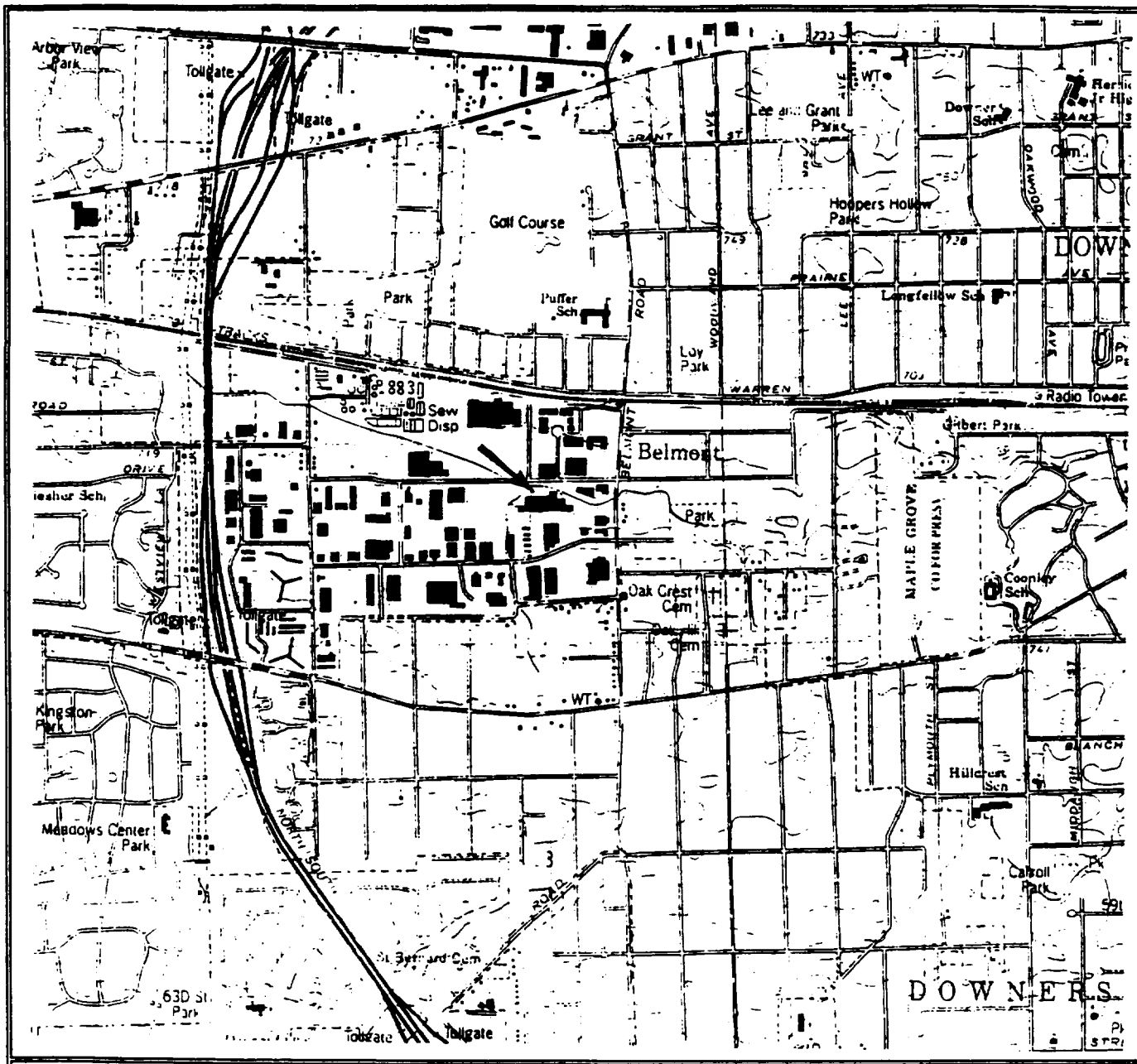
Key

- Ⓐ Milling Drilling Brooching Dept.
- Ⓑ Deburr Dept.
- Ⓒ Nital Etch
- Ⓓ Lathe Dept.
- Ⓔ Maintenance
- Ⓕ Saw
- Ⓖ Heat Treatment
- Ⓗ Blasting Dept.
- Ⓘ Gear Cutting Dept.
- Ⓙ Outdoor Storage
- Ⓚ Spur Grinding
- Ⓛ Cutter Sharpening
- Ⓜ Hob-Shape Dept.
- Ⓝ Steam Clean Room
- Ⓞ Shipping & Receiving
- Ⓟ ID/OD Grinding
- Ⓠ Final
- Ⓡ Tool Crib
- Ⓢ Gearbox Assembly
- Ⓣ Heat Treat Lab
- Ⓤ Tooth Grinding
- Ⓥ Lapping
- • Storm Drain

N

SWPPP LAYOUT

Company	Arrow Gear Company
Address	2301 Curtis Street
City	Downers Grove
State	Illinois
County	DuPage
Date	5/01



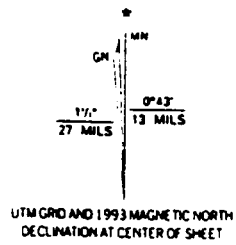
SCALE 1:24 000

1 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

CONTOUR INTERVAL 10 FEET



UTM GRID AND 1993 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

WHEATON QUADRANGLE
ILLINOIS
7.5 MINUTE SERIES

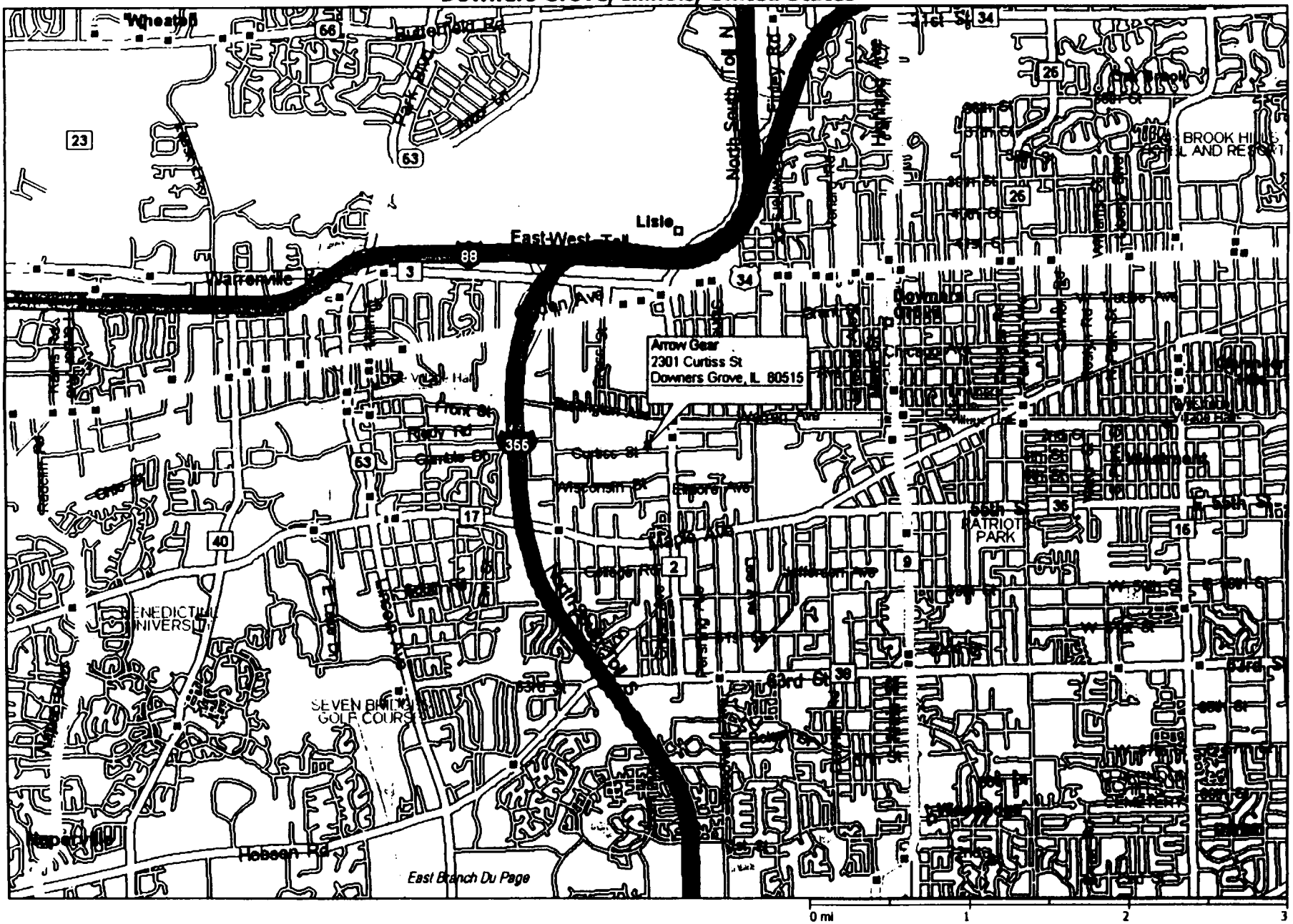
ARROW GEAR COMPANY

2301 CURTIS STREET

DOWNERS GROVE, ILLINOIS

TOPOGRAPHIC MAP

Downers Grove, Illinois, United States



APPENDIX B

Appendix B

Material Inventory Table

List of Significant Spills/Leaks

Pollutant Source Identification

Implementation of BMPs

MATERIAL INVENTORY

ARROW GEAR COMPANY

Worksheet #3
Completed by: Jason White
Title: EHS Compliance Manager
Date: August 22, 2001

Instructions: List all materials used, stored, or produced onsite. Assess and evaluate these materials for their potential to contribute pollutants to storm water runoff. Also complete Worksheet 3A if the material has been exposed during the last 3 years.

Material	Purpose/Location	Maximum Quantity Stored (lbs)	Quantity Exposed in Last 3 Years	Likelihood of contact with storm water If yes, describe reason	Past Significant Spill or Leak	
#89 GEAR MARKING COMPOUND	I, U & V	5	minimal	minimal		no
00482 TRANSULTEX A	J & K	4087 355195	minimal	minimal		no
28E9 ANSI 49 MED LT GREY SD GL	C, F & N	50	minimal	minimal		no
28Y10LF ORANGE S D GLOSS EN	C, F & N	10	minimal	minimal		no
3W799	E	5	minimal	minimal		no
73X BLACK MARKING INK	B	8 351	minimal	minimal		no
73X WHITE MARKING INK	A	10 8563	minimal	minimal		no
AEROSHELL FLUID 5LA	O	37 16195	minimal	minimal		no
AIRLINE 10W/NR	E & T	37 99705	minimal	minimal		no
ALL SANDVIK COROMANT CEMENTED TUNGSTEN CARBIDE GRADES	D	10	minimal	minimal		no
ALL SANDVIK COROMANT CERMET GRADES	D	10	minimal	minimal		no
ALLOY STEEL - HR & CR ALLOY LEADED STEEL	F & J	177400	minimal	minimal		no
ALUMINUM ALLOYS, ALUMINUM ALLOYS CONTAINING LEAD	F & J	7200	minimal	minimal		no
AMMONIA	C & H	450	minimal	minimal		no
AMS-3100~YELLOW ZINC CHROMATE PRIMER REV G PRIMER Z/C	S	38 8	minimal	minimal		no
ARGON	E	33 3451008	minimal	minimal		no
ARGOSHIELD #25C	E	33 3451008	minimal	minimal		no
ARGOSHIELD GAS #50A, #75 AND #75A	E	3 335818464	minimal	minimal		no
ARP 2	G	20	minimal	minimal		no
ARROWBLAST, TBS	D	100	minimal	minimal		no
ASSEMBLY FLUID #1	S	5	minimal	minimal		no

BALLOTINI IMPACT BEADS	H	1000	minimal	minimal		no
BLASOCUT 2000 UNIVERSAL	PLANT WIDE	8150 576	minimal	minimal		no
BLASOCUT GRINDEX	F & P	439 554885	minimal	minimal		no
CARBON STEEL - HR & CR LEADED STEEL	F & J	10600	minimal	minimal		no
CAT, BMS 10-11U, TY I, CL A, GRD E	S	18 8072871	minimal	minimal		no
CAUSTIC SODA ANHYDROUS (ALL GRADES)	C	50	minimal	minimal		no
CBN	D	10	minimal	minimal		no
CC670	D	10	minimal	minimal		no
CERFA-KLEEN 5390	G	523 6077	minimal	minimal		no
CLOVER SILICON CARBIDE GREASE MIX LAPPING COMPOUND	V	1300	minimal	minimal		no
CONDURSAL 0090	C	20	minimal	minimal		no
CONDURSAL 710	C	100	minimal	minimal		no
CONDURSAL N523	C	20	minimal	minimal		no
COOL TOOL	A & B	417 96755	minimal	minimal		no
COPPER BERYLLIUM WROUGHT ALLOY	F & J	275	minimal	minimal		no
COPPER BERYLLIUM WROUGHT ALLOYS	F	168	minimal	minimal		no
CORFILM 14	O	376 6301	minimal	minimal		no
CORROSION VARNISH	C & G	24	minimal	minimal		no
COW CORNING 2 MOLY POWDER	P	40 0848	minimal	minimal		no
CRYSTOLON, SILICON CARBIDE	D	1000	minimal	minimal		no
CT 410-AG	O & P	423 019905	minimal	minimal		no
DAG 154	J, N & O	826 749	minimal	minimal		no
DEGUSSA 5600 FOIL (MB565)	E	10	minimal	minimal		no
DELRIN(R) ACETAL RESIN	A, D, F & E	100	minimal	minimal		no
DETREX YELLOW GEAR MARKING COMPOUND	V	75 159	minimal	minimal		no
DEVCON PLASTIC STEEL LIQUID (B) RESIN	E	23 3828	minimal	minimal		no
DIAMOND OR CUBIC BORON NITRIDE GRINDING WHEELS	D, L & P	5000	minimal	minimal		no
EMERY CAKE BUFFING COMPOSITION	B	36	minimal	minimal		no
EXOLON, FASTBLAST	H	1000	minimal	minimal		no

EXTREME PRESSURE LUBE #3	E & N	39 709005	minimal	minimal		no
EXTREME PRESSURE OIL	E & N	39 4793525	minimal	minimal		no
GASEOUS OXYGEN	E & G	160 2583488	minimal	minimal		no
HANGSTERFER'S ALDRAW J-1	V	101 8822	minimal	minimal		no
HIGH SPEED STEELS AND TUNGSTEN CARBIDES	L & M	100	minimal	minimal		no
HI-SPOT BLUE #107	E & R	5	minimal	minimal		no
HOLSTER/INSTAPACKER™ SOLVENT	O	5	minimal	minimal		no
HOUGHTO-QUENCH G	G & J	25721 08	minimal	minimal		no
HOUGHTO-QUENCH K	G	2229 717	minimal	minimal		no
INSTAPAK® -40W COMPONENT "B"	O	701 484	minimal	minimal		no
INSTAPAK® COMPONENT "A"	O	828 4192	minimal	minimal		no
INSTAPAK® PORT CLEANER	O	5	minimal	minimal		no
INSTED-A-LED	A	116 914	minimal	minimal		no
ISOPREP® 44	C	250 53	minimal	minimal		no
ISOPROPYL ALCOHOL	C & J	1811 958225	minimal	minimal		no
K090	D	50	minimal	minimal		no
K313, K714, KC732, KS1, KZ313, KZ714, SP313, SP939	D	150	minimal	minimal		no
KOEBEL SUPER CATALYST	G	500	minimal	minimal		no
KYON 2000, KYON 2100, KYON 3000, KYON 3400, KENNMETAL SIALON	D	50	minimal	minimal		no
LPS 1 GREASELESS LUBRICANT	O	33 404	minimal	minimal		no
LPS 2 INDUSTRIAL-STRENGTH LUBRICANT	O	35 0742	minimal	minimal		no
LPS 3 HEAVY-DUTY RUST INHIBITOR	O	138 6266	minimal	minimal		no
LR-600-S	B	16 702	minimal	minimal		no
LUMP PUMIC STONE	B	100	minimal	minimal		no
MANCHASTER TOOL CARBIDE	D	10	minimal	minimal		no
MAYWOOD ACRYL LACQUER THINNER	E, K & N	136 9564	minimal	minimal		no
METEX FA COPPER STRIPPER	C	4000	minimal	minimal		no
METEX FB COPPER STRIPPER	C	6459 4985	minimal	minimal		no
METHANOL	C & J	1828 0339	minimal	minimal		no

MICCROSTOP	C	7 93345	minimal	minimal		no
MICROGRADED ALUNDUM	D	100	minimal	minimal		no
MOBIL 600 W SUPER CYLINDER OIL	J	112 7385	minimal	minimal		no
MOBIL ALMO 525	B & E	10	minimal	minimal		no
MOBIL DTE 11M	J	400 054655	minimal	minimal		no
MOBIL DTE 13M	J	146 47654	minimal	minimal		no
MOBIL DTE 25	J	7390 635	minimal	minimal		no
MOBIL DTE 26	J	22297 17	minimal	minimal		no
MOBIL DTE OIL LIGHT	J	399 59535	minimal	minimal		no
MOBIL MULTI-PURPOSE ATF	J	2204 664	minimal	minimal		no
MOBIL SHC 632	J	144 80634	minimal	minimal		no
MOBIL SHC 634	J	145 14038	minimal	minimal		no
MOBIL VACOULINE OIL 1409	J	1484 8078	minimal	minimal		no
MOBIL VACTRA OIL NO 1	J	144 97336	minimal	minimal		no
MOBIL VACTRA OIL NO 2	J	1468 1058	minimal	minimal		no
MOBIL VACTRA OIL NO 3	J	404 1884	minimal	minimal		no
MOBIL VACTRA OIL NO 4	J	1489 8184	minimal	minimal		no
MOBIL VELOCITE OIL NO 10	J	1436 372	minimal	minimal		no
MOBIL VELOCITE OIL NO 3	J	668 08	minimal	minimal		no
MOBIL VELOCITE OIL NO 6	J	1407 9786	minimal	minimal		no
MOBILFLUID 424	J	148 6478	minimal	minimal		no
MOBILGEAR 626	J	148 14674	minimal	minimal		no
MOBILGEAR 629	J	148 6478	minimal	minimal		no
MOBILGEAR 632	J	149 98396	minimal	minimal		no
MOBILGREASE 28	J	50	minimal	minimal		no
MOBILITH AW-2	J	100	minimal	minimal		no
MOBILITH SHC 460	J	20	minimal	minimal		no
MOBILMET ALPHA	J	14447 23	minimal	minimal		no
MOBILMET KAPPA CCF	J	1481 4674	minimal	minimal		no

MOBILMET NU	J	14764 568	minimal	minimal		no
MOBILMET UPSILON	J	14196 7	minimal	minimal		no
MOBILSOL A	J	36 7444	minimal	minimal		no
MOBILTEMP SHC 32	J	50	minimal	minimal		no
MOBILUBE HD 85W-140	J	150 318	minimal	minimal		no
MOBILUX 2	J	76 99622	minimal	minimal		no
MOBILUX EP 023	J	75 32602	minimal	minimal		no
MOLYKOTE® 1000 ANTI-SEIZE LUBRICANT	E	5	minimal	minimal		no
MOLYKOTE® 1000 PASTE	D	10	minimal	minimal		no
MOLYKOTE® G-N PASTE	D & E	20	minimal	minimal		no
NICKEL PLATED ABRASIVE PRODUCTS	D	10	minimal	minimal		no
NITROGEN, REFRIGERATED LIQUID	J	24301 41	minimal	minimal		no
OIL ABSORBENT	PLANT WIDE	2000	minimal	minimal		no
ORIGINAL PIG® ABSORBENT SOCKS	D	200	minimal	minimal		no
OSTALLOY 158	Q	30	minimal	minimal		no
PCD	D	10	minimal	minimal		no
PEEL COAT - TYPE I	O	200	minimal	minimal		no
PERCHEM 1130	B & C	6.6782947	minimal	minimal		no
PERCHEM 1140	PLANT WIDE	6558 0403	minimal	minimal		no
PERCHEM 1330	C, I & V	1488 423783	minimal	minimal		no
PERCHEM 1345-CS	N	465 0463125	minimal	minimal		no
PERKOTE 30-353-AG	PLANT WIDE	6985 6115	minimal	minimal		no
PERKUT 955	O & P	401 156987	minimal	minimal		no
PERLUBE RO-68	I, J & O	22059 1665	minimal	minimal		no
PETROLANE PROPANE	E, G & O	750	minimal	minimal		no
POCO GRAPHITE EDM-3	E	1	minimal	minimal		no
POLYURETHANE CATALYST	B	8 85	minimal	minimal		no
POLYURETHANE TOPCOAT - CLEAR	B	8 77	minimal	minimal		no
PRESSED RUBBER WHEEL	B	10	minimal	minimal		no

REFRACTORY CERAMIC FIBER PRODUCT	G	100	minimal	minimal		no
ROTARY CUTTING TOOLS	D	10	minimal	minimal		no
ROYCO 885	O	15 53286	minimal	minimal		no
RPC2100, RPC2300	G	100	minimal	minimal		no
RUST FOIL 2675	O	111 861645	minimal	minimal		no
RUST FOIL L-492 SPEC	O	140 2968	minimal	minimal		no
RUSTAREST 53216	C & O	1001 2849	minimal	minimal		no
RUST-BAN 392	O	367 444	minimal	minimal		no
RYKON PREMIUM GREASE NO 2	E	50	minimal	minimal		no
SAF-T-EZE NICKEL PREMIUM ANTI-SEIZE	E & G	5	minimal	minimal		no
SANDVIK COROMANT GRADE CC620	D	10	minimal	minimal		no
SC-120, 180, 240, 320, 400-AGHV LAPPING COMPOUNDS	V	3000	minimal	minimal		no
SILASTIC® 732 RTV SEALANT - CLEAR	E	10	minimal	minimal		no
SILICON CARBIDE FINES, FRIT, OR CLAY BONDED	G	100	minimal	minimal		no
SILVER-COPPER-CADMIUM-ZINC BRAZING ALLOYS	E	10	minimal	minimal		no
SIMPLE GREEN (OIL DISPERSANT)	E	12	minimal	minimal		no
SODIUM CARBONATE	C	50	minimal	minimal		no
STAINLESS STEEL	F & J	5700	minimal	minimal		no
STEEL BLUE, DX-100	E & R	70 1484	minimal	minimal		no
STEEL RED, DX-966, DX-296, RED DL	E & R	70 1484	minimal	minimal		no
SUNNEN HONING STONES	E, P & R	100	minimal	minimal		no
SW-3	C	50	minimal	minimal		no
TECTYL 275	S	408 78145	minimal	minimal		no
THINNER	C & H	20 4	minimal	minimal		no
TOLUENE	C	43 09116	minimal	minimal		no
TUNGSTEN CARBIDE WITH COBALT BINDER	D	100	minimal	minimal		no
TURCO VITRO-KLENE	C	670	minimal	minimal		no
VITRIFIED BONDED-ABRASIVE PRODUCTS	D, P & U	100	minimal	minimal		no
WHITE GEAR MARKING COMPOUND	I	10	minimal	minimal		no

YELLOW DXX-526, DLT, DXX-340	R	72 6537	minimal	minimal	70

LIST OF SIGNIFICANT SPILLS AND LEAKS	**Completed by:** Jason White **Title:** Environmental Manager **Date:** August 23, 2001

Instructions: Record below all significant spills and significant leaks of toxic or hazardous pollutants that have occurred at the facility in the past three years.

Definitions: Significant spills include, but are not limited to, releases of oil or hazardous substances in excess of reportable quantities.

1st Year

Date	*Spill*	*Leak*	*Location*	*Type of material*	*Quantity*	*Source*	*Reason*	*Amount of Material Recovered*	*Material No Longer Exposed to Storm water*	*Preventative Measure Taken*
NONE										

2nd Year

Date	*Spill*	*Leak*	*Location*	*Type of material*	*Quantity*	*Source*	*Reason*	*Amount of Material Recovered*	*Material No Longer Exposed to Storm water*	*Preventative Measure Taken*
NONE										

3rd Year

Date	*Spill*	*Leak*	*Location*	*Type of material*	*Quantity*	*Source*	*Reason*	*Amount of Material Recovered*	*Material No Longer Exposed to Storm water*	*Preventative Measure Taken*
NONE										

POLLUTANT SOURCE IDENTIFICATION	Completed by: Jason White. Title: Environmental Manager Date: August 23, 2001

Instructions: List all identified storm water pollutant sources and describe existing management practices that address those sources. In the third column, list BMP options that can be incorporated into the plan to address remaining sources of pollutants.

Storm Water Pollutant Sources	Existing Management Practices	Description of New BMP Options
1. Raw Material (steel)	Stored over concrete..	Continue with existing BMP. Reduce amount of material stored outside. Investigate possibility of providing cover for storage area.
2. Scrap Metal Dumpsters	Metal is stored in a bin. The bin is covered with a tarp.	Continue with existing BMPs.
3. Drums and Other Containers	Drums are stored within steel storage sheds.	Continue with existing BMPs.
4. Used Oil Sorbent Dumpsters	Stored over concrete. Dumpster is covered.	Continue with existing BMPs.
5. Industrial Trash Compactor	Stored over concrete. Compactor design prevent storm water accumulation and contamination.	Continue with existing BMPs.
6. Wooden Pallets	Stored over concrete.	Continue with existing BMPs. Implement employee training to ensure that contaminated and oily equipment is not put into storage.
7. Powered Industrial Trucks and Equipment	Used and stored over concrete or other impermeable paving materials. Equipment is used and stored under cover when possible.	Continue with existing BMPs. Ensure that employees are trained appropriately to minimize incidents that may lead to of spills and leaks.

IMPLEMENTATION

Completed by: Jason White
Title: Environmental Manager
Date: August 23, 2001

Instructions: Develop a schedule for implementing each BMP. Provide a brief description of each BMP, the steps necessary to implement the BMP (i.e., a construction or design), the schedule for completing those steps (list dates) and the person(s) responsible for the implementation.

BMP	Description of Actions Required for Implementation	Scheduled Completion Dates	Responsible Party	Notes
Good Housekeeping	1. Keep all areas as clean as possible. 2. Evaluate existing training programs for possible improvement. 3. Conduct training and/or refresher training.	Ongoing	SWPPP Team and appropriate management staff.	
Preventive Maintenance	1. Aggressively pursue scheduled maintenance	Ongoing	SWPPP Team and appropriate management staff.	
Inspections	1. A property evaluation should be made and documented at least monthly. 2. Post-rain event: check for signs of runoff contamination	As required by SWPPP.	SWPPP Team and appropriate management staff.	
Spill Prevention and Response	1. Train employees on how to stop, contain, and clean-up spills, and train them on notification process 2. Ensure spill containment materials/equipment are available at all potential spill sites.	Ongoing	SWPPP Team and appropriate management staff.	
Sediment and Erosion Control	1. Keep paved areas maintained. 2. Seed/sod all non-vegetated potential erosion areas.	Ongonig	SWPPP Team and appropriate management staff.	
Management of Runoff	1. Continue BMPs already in place. 2. Other as applicable	Ongoing	SWPPP Team and appropriate management staff.	
Additional BMPs	1. Implement a program to ensure that all items are clean prior to placing them into outdoor storage. 2. Ensure that industrial equipment operators are properly trained to minimize spills and drum punctures. 3. Investigate moving pallets and raw materials under cover.	1. 11/01/01 2. 11/01/01 3. 11/01/01	SWPPP Team and appropriate management staff. SWPPP Team and appropriate management staff. SWPPP Team and appropriate management staff.	

APPENDIX C

Appendix C

Facility & EPA 313 Water Priority Chemical List

SECTION 313--WATER PRIORITY CHEMICALS: ARROW GEAR COMPANY

MSDS	MFG NAME	PRODUCT NAME	MAX WT	CHEMICAL NAME	%	CHEM WT	CAS#	PS
7429-90-5	**ALUMINUM**							
9	SAF-T-EZE DIV., STL COMPOUND CORPORATION	SAF-T-EZE NICKEL PREMIUM ANTI-SEIZE	5.00	ALUMINUM	100	5.00	7429-90-5	GEL
101	SUNNEN PRODUCTS COMPANY	SUNNEN HONING STONES	100.00	ALUMINUM	5	5.00	7429-90-5	S
170	VARIOUS	CARBON STEEL - HR & CR LEADED STEEL	10,600.00	ALUMINUM	1	106.00	7429-90-5	S
172	VARIOUS	ALUMINUM ALLOYS, ALUMINUM ALLOYS CONTAINING LEAD	7,200.00	ALUMINUM	99.7	7,178.40	7429-90-5	S
174	VARIOUS	ALLOY STEEL - HR & CR ALLOY LEADED STEEL	177,400.00	ALUMINUM	2	3,548.00	7429-90-5	S
				313 WATER PRIORITY AGGREGATE =		**10,842.40**		
7664-41-7	**AMMONIA**							
89	LAROCHE INDUSTRIES, INC.	AMMONIA	450.00	AMMONIA	99.5	447.75	7664-41-7	L
				313 WATER PRIORITY AGGREGATE =		**447.75**		
7440-41-7	**BERYLLIUM**							
69	BRUSH WELLMAN ENGINEERING MATERIALS	COPPER BERYLLIUM WROUGHT ALLOYS	168.00	BERYLLIUM	2	3.36	7440-41-7	S
171	BRUSH WELLMAN ENGINEERED MATERIALS	COPPER BERYLLIUM WROUGHT ALLOY	275.00	BERYLLIUM	2	5.50	7440-41-7	S
				313 WATER PRIORITY AGGREGATE =		**8.86**		
7440-43-9	**CADMIUM**							
104	ARCONIUM SPECIALTY ALLOYS	OSTALLOY 158	30.00	CADMIUM	10.1	3.03	7440-43-9	S
105	HANDY & HARMAN	SILVER-COPPER-CADMIUM-ZINC BRAZING ALLOYS	10.00	CADMIUM	24	2.40	7440-43-9	S
				313 WATER PRIORITY AGGREGATE =		**5.43**		
7782-50-5	**CHLORINE**							
118	MOBIL OIL CORPORATION	MOBIL ALMO 525	10.00	CHLORINE	0.9	0.09	7782-50-5	L
155	MOBIL OIL CORPORATION	MOBILMET NU	14,764.57	CHLORINE	0.8	118.12	7782-50-5	L
159	MOBIL OIL CORPORATION	MOBILUX EP 023	75.33	CHLORINE	0.63	0.47	7782-50-5	GEL
				313 WATER PRIORITY AGGREGATE =		**118.68**		

SECTION 313--WATER PRIORITY CHEMICALS: ARROW GEAR COMPANY

MSDS	MFG NAME	PRODUCT NAME	MAX WT	CHEMICAL NAME	%	CHEM WT	CAS#	PS
7440-47-3	**CHROMIUM**							
10	MANCHASTER TOOL COMPANY	MANCHASTER TOOL CARBIDE	10.00	CHROMIUM	5	0.50	7440-47-3	S
14	FELLOWS CORPORATION	HIGH SPEED STEELS AND TUNGSTEN CARBIDES	100.00	CHROMIUM	4.25	4.25	7440-47-3	S
32	SANDVIK COROMANT COMPANY	ALL SANDVIK COROMANT CEMENTED TUNGSTEN CARBIDE	10.00	CHROMIUM	3	0.30	7440-47-3	S
40	SANDVIK COROMANT COMPANY	CBN	10.00	CHROMIUM	2	0.20	7440-47-3	S
41	SANDVIK COROMANT COMPANY	PCD	10.00	CHROMIUM	2	0.20	7440-47-3	S
49	ITW FLUID PRODUCTS GROUP	YELLOW DXX-526, DLT, DXX-340	72.65	CHROMIUM	5	3.63	7440-47-3	L
172	VARIOUS	ALUMINUM ALLOYS, ALUMINUM ALLOYS CONTAINING LEAD	7,200.00	CHROMIUM	0.5	36.00	7440-47-3	S
173	VARIOUS	STAINLESS STEEL	5,700.00	CHROMIUM	30	1,710.00	7440-47-3	S
174	VARIOUS	ALLOY STEEL - HR & CR ALLOY LEADED STEEL	177,400.00	CHROMIUM	5	8,870.00	7440-47-3	S
183	SANDVIK COROMANT COMPANY	ALL SANDVIK COROMANT CERMET GRADES	10.00	CHROMIUM	3	0.30	7440-47-3	S
				313 WATER PRIORITY AGGREGATE =		**10,625.38**		
7440-50-8	**COPPER**							
39	SANDVIK COROMANT COMPANY	MOLYKOTE® 1000 PASTE	10.00	COPPER	7	0.70	7440-50-8	PST
48	NORTON COMPANY	DIAMOND OR CUBIC BORON NITRIDE GRINDING WHEELS	5,000.00	COPPER	85	4,250.00	7440-50-8	S
69	BRUSH WELLMAN ENGINEERING MATERIALS	COPPER BERYLLIUM WROUGHT ALLOYS	168.00	COPPER	92.8	155.90	7440-50-8	S
79	DEGUSSA CORPORATION	DEGUSSA 5600 FOIL (MB565)	10.00	COPPER	100	10.00	7440-50-8	S
101	SUNNEN PRODUCTS COMPANY	SUNNEN HONING STONES	100.00	COPPER	5	5.00	7440-50-8	S
105	HANDY & HARMAN	SILVER-COPPER-CADMIUM-ZINC BRAZING ALLOYS	10.00	COPPER	45	4.50	7440-50-8	S
171	BRUSH WELLMAN ENGINEERED MATERIALS	COPPER BERYLLIUM WROUGHT ALLOY	275.00	COPPER	99	272.25	7440-50-8	S
172	VARIOUS	ALUMINUM ALLOYS, ALUMINUM ALLOYS CONTAINING LEAD	7,200.00	COPPER	10	720.00	7440-50-8	S
173	VARIOUS	STAINLESS STEEL	5,700.00	COPPER	6	342.00	7440-50-8	S

SECTION 313--WATER PRIORITY CHEMICALS: ARROW GEAR COMPANY

MSDS	MFG NAME	PRODUCT NAME	MAX WT	CHEMICAL NAME	%	CHEM WT	CAS#	PS
174	VARIOUS	ALLOY STEEL - HR & CR ALLOY LEADED STEEL	177,400.00	COPPER	1	1,774.00	7440-50-8	S
				313 WATER PRIORITY AGGREGATE =		**7,534.35**		
7439-92-1	**LEAD**							
49	ITW FLUID PRODUCTS GROUP	YELLOW DXX-526, DLT, DXX-340	72.65	LEAD	5	3.63	7439-92-1	L
104	ARCONIUM SPECIALTY ALLOYS	OSTALLOY 158	30.00	LEAD	27.3	8.19	7439-92-1	S
170	VARIOUS	CARBON STEEL - HR & CR LEADED STEEL	10,600.00	LEAD	1	106.00	7439-92-1	S
172	VARIOUS	ALUMINUM ALLOYS, ALUMINUM ALLOYS CONTAINING LEAD	7,200.00	LEAD	1	72.00	7439-92-1	S
174	VARIOUS	ALLOY STEEL - HR & CR ALLOY LEADED STEEL	177,400.00	LEAD	1	1,774.00	7439-92-1	S
				313 WATER PRIORITY AGGREGATE =		**1,963.82**		
7440-02-0	**NICKEL**							
7	T.J. MARTIN COMPANY	NICKEL PLATED ABRASIVE PRODUCTS	10.00	NICKEL	100	10.00	7440-02-0	S
9	SAF-T-EZE DIV., STL COMPOUND CORPORATION	SAF-T-EZE NICKEL PREMIUM ANTI-SEIZE	5.00	NICKEL	100	5.00	7440-02-0	GEL
14	FELLOWS CORPORATION	HIGH SPEED STEELS AND TUNGSTEN CARBIDES	100.00	NICKEL	91.9	91.90	7440-02-0	S
40	SANDVIK COROMANT COMPANY	CBN	10.00	NICKEL	0.35	0.04	7440-02-0	S
48	NORTON COMPANY	DIAMOND OR CUBIC BORON NITRIDE GRINDING WHEELS	5,000.00	NICKEL	82	4,100.00	7440-02-0	S
69	BRUSH WELLMAN ENGINEERING MATERIALS	COPPER BERYLLIUM WROUGHT ALLOYS	168.00	NICKEL	22	36.96	7440-02-0	S
171	BRUSH WELLMAN ENGINEERED MATERIALS	COPPER BERYLLIUM WROUGHT ALLOY	275.00	NICKEL	2.2	6.05	7440-02-0	S
172	VARIOUS	ALUMINUM ALLOYS, ALUMINUM ALLOYS CONTAINING LEAD	7,200.00	NICKEL	0.5	36.00	7440-02-0	S
173	VARIOUS	STAINLESS STEEL	5,700.00	NICKEL	27	1,539.00	7440-02-0	S
174	VARIOUS	ALLOY STEEL - HR & CR ALLOY LEADED STEEL	177,400.00	NICKEL	5	8,870.00	7440-02-0	S
183	SANDVIK COROMANT COMPANY	ALL SANDVIK COROMANT CERMET GRADES	10.00	NICKEL	15	1.50	7440-02-0	S
				313 WATER PRIORITY AGGREGATE =		**14,696.45**		

SECTION 313--WATER PRIORITY CHEMICALS: ARROW GEAR COMPANY

MSDS	MFG NAME	PRODUCT NAME	MAX WT	CHEMICAL NAME	%	CHEM WT	CAS#	PS
7723-14-0	**PHOSPHORUS**							
48	NORTON COMPANY	DIAMOND OR CUBIC BORON NITRIDE GRINDING WHEELS	5,000.00	PHOSPHORUS	1	50.00	7723-14-0	S
170	VARIOUS	CARBON STEEL - HR & CR LEADED STEEL	10,600.00	PHOSPHORUS	1	106.00	7723-14-0	S
173	VARIOUS	STAINLESS STEEL	5,700.00	PHOSPHORUS	2	114.00	7723-14-0	S
				313 WATER PRIORITY AGGREGATE =		**270.00**		
75-56-9	**PROPYLENE OXIDE**							
65	THE TOLBER DIVISION	MICCROSTOP	7.93	PROPYLENE OXIDE	7	0.56	75-56-9	I.
				313 WATER PRIORITY AGGREGATE =		**0.56**		
7440-22-4	**SILVER**							
48	NORTON COMPANY	DIAMOND OR CUBIC BORON NITRIDE GRINDING WHEELS	5,000.00	SILVER	85	4,250.00	7440-22-4	S
79	DEGUSSA CORPORATION	DEGUSSA 5600 FOIL (MB565)	10.00	SILVER	100	10.00	7440-22-4	S
105	HANDY & HARMAN	SILVER-COPPER-CADMIUM-ZINC BRAZING ALLOYS	10.00	SILVER	50	5.00	7440-22-4	S
				313 WATER PRIORITY AGGREGATE =		**4,265.00**		
108-88-3	**TOLUENE**							
49	ITW FLUID PRODUCTS GROUP	YELLOW DXX-526, DLT, DXX-340	72.65	TOLUENE	5	3.63	108-88-3	I.
70	MALLINCKRODT BAKER, INC.	TOLUENE	43.09	TOLUENE	100	43.09	108-88-3	I.
102	MAYWOOD COMPANY	MAYWOOD ACRYL LACQUER THINNER	136.96	TOLUENE	25	34.24	108-88-3	I.
110	RANDOLPH PRODUCTS COMPANY	AMS-3100~YELLOW ZINC CHROMATE PRIMER REV G PRIMER	38.80	TOLUENE	5	1.94	108-88-3	I.
127	MOBIL OIL CORPORATION	MOBIL VELOCITE OIL NO. 10	1,436.37	TOLUENE	0.01	0.14	108-88-3	I.
166	MOBIL OIL CORPORATION	MOBIL MULTI-PURPOSE ATF	2,204.66	TOLUENE	0.09	1.98	108-88-3	I.
				313 WATER PRIORITY AGGREGATE =		**85.03**		
7440-62-2	**VANADIUM**							
170	VARIOUS	CARBON STEEL - HR & CR LEADED STEEL	10,600.00	VANADIUM	1	106.00	7440-62-2	S
174	VARIOUS	ALLOY STEEL - HR & CR ALLOY LEADED STEEL	177,400.00	VANADIUM	2	3,548.00	7440-62-2	S

SECTION 313--WATER PRIORITY CHEMICALS: ARROW GEAR COMPANY

MSDS	MFG NAME	PRODUCT NAME	MAX WT	CHEMICAL NAME	%	CHEM WT	CAS#	PS
				313 WATER PRIORITY AGGREGATE =		**3,654.00**		
1330-20-7	**XYLENE**							
18	CARBIT PAINT COMPANY	28Y101.F ORANGE S.D. GLOSS EN	10.00	XYLENE	2	0.20	1330-20-7	I.
19	CARBIT PAINT COMPANY	28E9 ANSI 49 MED LT GREY SD GL	50.00	XYLENE	3	1.50	1330-20-7	I.
43	ERICH NUSSLE OHG	CONDURSAL 0090	20.00	XYLENE	25	5.00	1330-20-7	I.
44	ERICH NUSSLE OHG	CONDURSAL N523	20.00	XYLENE	100	20.00	1330-20-7	PST
102	MAYWOOD COMPANY	MAYWOOD ACRYL LACQUER THINNER	136.96	XYLENE	2	2.74	1330-20-7	I.
110	RANDOLPH PRODUCTS COMPANY	AMS-3100~YELLOW ZINC CHROMATE PRIMER REV G PRIMER	38.80	XYLENE	5	1.94	1330-20-7	I.
149	MOBIL OIL CORPORATION	MOBILITH AW-2	100.00	XYLENE	0.13	0.13	1330-20-7	GEL
180	THE DEXTER CORPORATION	POLYURETHANE CATALYST	8.85	XYLENE	20	1.77	1330-20-7	I.
				313 WATER PRIORITY AGGREGATE =		**33.28**		
7440-66-6	**ZINC**							
39	SANDVIK COROMANT COMPANY	MOLYKOTE® 1000 PASTE	10.00	ZINC	4	0.40	7440-66-6	PST
79	DEGUSSA CORPORATION	DEGUSSA 5600 FOIL (MB565)	10.00	ZINC	100	10.00	7440-66-6	S
105	HANDY & HARMAN	SILVER-COPPER-CADMIUM-ZINC BRAZING ALLOYS	10.00	ZINC	30	3.00	7440-66-6	S
118	MOBIL OIL CORPORATION	MOBIL ALMO 525	10.00	ZINC	0.09	0.01	7440-66-6	I.
125	MOBIL OIL CORPORATION	MOBIL DTE 11M	400.05	ZINC	0.1	0.40	7440-66-6	I.
132	MOBIL OIL CORPORATION	MOBIL DTE 26	22,297.17	ZINC	0.1	22.30	7440-66-6	I.
133	MOBIL OIL CORPORATION	MOBIL DTE 25	7,390.64	ZINC	0.1	7.39	7440-66-6	I.
149	MOBIL OIL CORPORATION	MOBILITH AW-2	100.00	ZINC	0.15	0.15	7440-66-6	GEL
159	MOBIL OIL CORPORATION	MOBILUX EP 023	75.33	ZINC	0.22	0.17	7440-66-6	GEL
172	VARIOUS	ALUMINUM ALLOYS, ALUMINUM ALLOYS CONTAINING LEAD	7,200.00	ZINC	10	720.00	7440-66-6	S

SECTION 313--WATER PRIORITY CHEMICALS: ARROW GEAR COMPANY

MSDS	MFG NAME	PRODUCT NAME	MAX WT	CHEMICAL NAME	%	CHEM WT	CAS#	PS
177	MOBIL OIL CORPORATION	MOBIL DTE 13M	146.48	ZINC	0.1	0.15	7440-66-6	I.

313 WATER PRIORITY AGGREGATE = 763.96

OTAL WEIGHT FOR ALL 313 WATER PRIORITY CANDIDATES = 55,314.95

SECTION 313 WATER PRIORITY CHEMICALS

CAS Number	Common Name
75-07-0	Acetaldehyde
107-02-8	Acrolein
107-13-1	Acrylonitrile
309-00-2	Aldrin[1,4:5,8-Dimethanonaphthalene,1,2,3,4,10,10-hexachloro-1,4,4a,5,8,8a hexahydro-(1.alpha.,4.alpha.,4a.beta.,5.alpha.,8.alpha.,8a.beta.)-]
107-05-1	Allyl Chloride
7429-90-5	Aluminum (fume or dust)
7664-41-7	Ammonia
62-53-3	Aniline
120-12-7	Anthracene
7440-36-0	Antimony
7647189	Antimony pentachloride
28300745	Antimony potassium tartrate
7789619	Antimony tribromide
10025919	Antimony trichloride
7783564	Antimony trifluoride
1309644	Antimony trioxide
7440-38-2	Arsenic
1303328	Arsenic disulfide
1303282	Arsenic pentoxide
7784341	Arsenic trichloride
1327533	Arsenic trioxide
1303339	Arsenic trisulfide
1332-21-4	Asbestos (friable)
542621	Barium cyanide
71-43-2	Benzene
92-87-5	Benzidine
100470	Benzonitrile
218019	Benzo(a)phenanthrene
50328	Benzo(a)pyrene
205992	Benzo(b)fluoranthene
205823	Benzo(j)fluoranthene
207089	Benzo(k)fluoranthene
189559	Benzo(rst)pentaphene
56553	Benzo(a)anthracene
100-44-7	Benzyl chloride
7440-41-7	Beryllium
7787475	Beryllium chloride
7787497	Beryllium fluoride
7787555	Beryllium nitrate
111-44-4	Bis(2-chloroethyl) ether
75-25-2	Bromoform

74-83-9	Bromomethane (Methyl bromide)
85-68-7	Butyl benzyl phthalate
7440-43-9	Cadmium
543908	Cadmium acetate
7789426	Cadmium bromide
10108642	Cadmium chloride
7778441	Calcium arsenate
52740166	Calcium arsenite
13765190	Calcium chromate
592018	Calcium cyanide
133-06-2	Captan [1H-Isoindole-1,3(2H)-dione,3a,4,7,7a-tetrahydro-2-[(trichloromethyl)thio]-]
63-25-2	Carbaryl [1-Naphthalenol, methylcarbamate]
75-15-0	Carbon disulfide
1563662	Carbofuran
56-23-5	Carbon tetrachloride
57-74-9	Chlordane [4,7-Methanoindan,1,2,4,5,6,7,8,8- octachloro-2,3,3a,4,7,7a-hexahydro-]
7782-50-5	Chlorine
59-50-7	4-Chloro 3-methyl phenol p-Chloro-m-cresol
108-90-7	Chlorobenzene
75-00-3	Chloroethane (Ethyl chloride)
67-66-3	Chloroform
74-87-3	Chloromethane (Methyl chloride)
95-57-8	2-Chlorophenol
106-48-9	4-Chlorophenol
75729	Chlorotrifluoromethane
1066304	Chromic acetate
11115745	Chromic acid
10101538	Chromic sulfate
7440-47-3	Chromium
1308-14-1	Chromium (Tri)
10049055	Chromous chloride
7789437	Cobaltous bromide
544183	Cobaltous formate
14017415	Cobaltous sulfamate
7440-50-8	Copper
108-39-4	m-Cresol
9548-7	o-Cresol
106-44-5	p-Cresol
4170303	Crotonaldehyde
1319-77-3	Cresol (mixed isomers)
142712	Cupric acetate
12002038	Cupric acetoarsenite
7447394	Cupric chloride

3251238	Cupric nitrate
5893663	Cupric oxalate
7758987	Cupric sulfate
10380297	Cupric sulfate, ammoniated
815827	Cupric tartrate
57-12-5	Cyanide
506774	Cyanogen chloride
333415	Diazinon
94-75-7	2,4-D [Acetic acid, (2,4-dichlorophenoxy)-]
226368	Dibenz(a,h)acridine
224420	Dibenz(a,j)acridene
5385751	Dibenzo(a,e)fluoranthene
192654	Dibenzo(a,e)pyrene
53703	Dibenzo(a,h)anthracene
189640	Dibenzo(a,l)pyrene
191300	Dibenzo(a,h)pyrene
194592	7, H-Dibenzo(c,g)carbazole
106-93-4	1,2-Dibromoethane (Ethylene dibromide)
84-74-2	Dibutyl phthalate
1929733	2,4 D Butoxyethyl ester
94804	2,4 D Butyl ester
2971382	2,4 D Chlorocrotyl ester
1918009	Dicamba
95-50-1	1,2-Dichlorobenzene
541-73-1	1,3-Dichlorobenzene
106-46-7	1,4-Dichlorobenzene
91-94-1	3,3'-Dichlorobenzidine
75-27-4	Dichlorobromomethane
107-06-2	1,2-Dichloroethane (Ethylene dichloride)
75434	Dichlorofluoromethane
540-59-0	1,2-Dichloroethylene
120-83-2	2,4-Dichlorophenol
78-87-5	1,2-Dichloropropane
10061026	trans-1,3-Dichloropropene
542-75-6	1,3-Dichloropropylene
62-73-7	Dichlorvos [Phosphoric acid, 2,2- dichloroethenyl dimethyl ester]
115-32-2	Dicofol [Benzenemethanol, 4-chloro-.alpha.-(4-chlorophenyl)-.alpha.-(trichloromethyl)-]
177-81-7	Di-(2-ethylhexyl) phthalate (DEHP)
84-66-2	Diethyl phthalate
124403	Dimethylamine
57976	7,12-Dimethylbenz(a)anthracene
105-67-9	2,4-Dimethylphenol
131-11-3	Dimethyl phthalate
534-52-1	4,6-Dinitro-o-cresol
51-28-5	2,4-Dinitrophenol

7784465	Sodium arsenite
10588019	Sodium bichromate
7775113	Sodium chromate
143339	Sodium cyanide
7632000	Sodium nitrite
10102188	Sodium selenite
7782823	" "
7789062	Strontium chromate
NA	Strychnine & salts
100-42-5	Styrene
7664-93-9	Sulfuric acid
79-34-5	1,1,2,2-Tetrachloroethane
127-18-4	Tetrachloroethylene (Perchloroethylene)
935-95-5	2,3,5,6-Tetrachlorophenol
78002	Tetraethyl lead
7440-28-0	Thallium
10031591	Thallium sulfate
108-88-3	Toluene
8001-35-2	Toxaphene
52-68-6	Trichlorfon [Phosphonic acid, (2,2,2-trichloro-1-hydroxyethyl)-dimethylester]
120-82-1	1,2,4-Trichlorobenzene
71-55-6	1,1,1-Trichloroethane (Methyl chloroform)
79-00-5	1,1,2-Trichloroethane
79-01-6	Trichloroethylene
95-95-4	2,4,5-Trichlorophenol
88-06-2	2,4,6-Trichlorophenol
121448	Triethylamine
7440-62-2	Vanadium (fume or dust)
108-05-4	Vinyl acetate
75-01-4	Vinyl chloride
75-35-4	Vinylidene chloride
108-38-3	m-Xylene
95-47-6	o-Xylene
106-42-3	p-Xylene
1330-20-7	Xylene (mixed isomers)
7440-66-6	Zinc (fume or dust)
557346	Zinc acetate
14639975	Zinc ammonium chloride
14639986	" " "
52628258	" " "
1332076	Zinc borate
7699458	Zinc bromide
3486359	Zinc carbonate
7646857	Zinc chloride
557211	Zinc cyanide

7783495	Zinc fluoride
557415	Zinc formate
7779864	Zinc hydrosulfite
7779886	Zinc nitrate
127822	Zinc phenolsulfonate
1314847	Zinc phosphide
16871719	Zinc silicofluoride
7733020	Zinc sulfate

APPENDIX D

Appendix D

Non-Storm Water Discharge Certification

NON-STORM WATER DISCHARGE ASSESSMENT AND CERTIFICATION					Completed by: Jason White Title: Environmental Manager Date: August 23, 2001
Date of Test or Evaluation	**Outfall Directly Observed During the Test**	**Method Used to Test or Evaluate Discharge**	**Describe Results from Test for the Presence of Non-Storm Water Discharge**	**Identify Potential Significant Sources**	**Name of Person Who Conducted the Test or Evaluation**
August 23, 2001	All Facility Outfalls	Visual	Negative		Jason White

CERTIFICATION

I, _____, certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for false information, including the possibility of fine and imprisonment for knowing violations.

Name & Official Title: ***Dave Reis. Chief Metallurgist***	***Area Code & Phone #: 630-969-7649***
Signature:	***Date Signed:***

APPENDIX E

Appendix E

Annual Comprehensive Site Compliance Evaluation Report (ACSCER)

This form will be completed by Vanguard Environmental, Inc. Personnel during the annual report update.

APPENDIX F

MONTHLY CHECKLIST FORM

ARROW GEAR

Date: _____ Performed by: _____

Signature: _____

Check For: Any discrepancies that have potential for pollution to storm water, including: leaks, improper containment, and changes in operations.

Areas To Be Checked (check mark indicated no problems):

___ Each Building (both interior and exterior)
___ Outdoor material storage (parts, scrap, etc.)
___ Outdoor fluid storage (waste oil containers, etc.)
___ Fueling or maintenance areas
___ Equipment (both rolling and stationary)
___ Structural Control Devices (dikes, berms, grading, vegetation, gravel/concrete, etc.)

Description of Discrepancy and Report of Repair:

Discrepancy	Corrective Action	Date & Initials
Signs of leaks, spills, rubbish, or debris		
Chemical Container Integrity		
Storm Water Mgmt Devices Integrity		
Other Discrepancies Noted		

APPENDIX G

Appendix G

Employee Training Record Form

ARROW GEAR
TRAINING RECORDS FORM

STORM WATER POLLUTION PREVENTION EMPLOYEE TRAINING ATTENDANCE			
DATE OF TRAINING:		INSTRUCTOR:	
Name (Print)	Signature	Shift	Comments

Appendix H

Sampling Instructions & Visual Evaluation Report

VISUAL SAMPLING INSTRUCTIONS

General Information

Storm water samples from each outfall should be collected quarterly and analyzed visually. The visual observation should occur during the first thirty (30) minutes to one hour of the discharge. The observation of the sample should be made at the time the sample is collected. These visual observations are only required to be made of discharges that occur during normal facility operation. When a sample is unable to be collected due to adverse climactic conditions, the reason for not performing the analysis must be documented and kept on file with the Plan.

Sampling Method

A manual sampling procedure will be used to capture storm water from the outfall. This will require the Team Leader or Member to be present during the storm event to manually collect the sample.

A grab sample should be collected within the first thirty (30) minutes to one hour of the beginning of the discharge.

Sampling Parameters

- The parameters required to be visually evaluated for the quarterly sample are: color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, and other obvious indicators of storm water pollution.

Sampling Location

Outfalls #2, #4, #7, #9, #10, and #11

Weir Construction

- Weir construction is not necessary at this time.
- If weir construction becomes necessary, a triangular-notch weir for flow is recommended. Other flow measurement devices such as permanent weirs and flumes may provide more accuracy, but must be constructed or purchased from commercial suppliers.

Collection Procedure

When collecting the sample for visual analysis, it is important to ensure that the container used to collect the sample is clear and clean so that accurate observations may be made.

Collection Procedure

When collecting the sample for visual analysis, it is important to ensure that the container used to collect the sample is clear and clean so that accurate observations may be made.

Visual Examination Procedure

The examination of the sample must be made in well lit areas. Whenever practical the same individual should carry out the collection and examination of discharges throughout the life of the permit to ensure the greatest degree of consistency possible in recording observations. Be sure to log the date and time, name of the examiner, visual quality of the sample, and probable sources of any observed storm water contamination.

When conducting the visual examination, the Pollution Prevention Team, or team member, should attempt to relate the results of the examination to potential sources of storm water contamination on the site. For example, if the visual examination reveals an oil sheen, the facility personnel should conduct an inspection of the area of the site draining to the examined discharge to look for obvious sources of spilled oil, leaks, etc. If a source can be located, then this information allows the facility operator to immediately conduct a clean-up of the pollutant source, and/or to design a change to the pollution prevention plan to eliminate or minimize the contaminant source from occurring in the future.

To be most effective, the personnel conducting the visual examination should be fully knowledgeable about the plan, the sources of contaminants on the site, the industrial activities that are exposed to storm water, and the day to day operations that may cause unexpected releases.

ARROW GEAR
STORM WATER VISUAL INSPECTION REPORT

Date:_____ Performed By:_____
Outfall:_____

Parameter	Quality	Probable Source
Color		
Odor		
Clarity		
Floating Solids		
Settled Solids		
Suspended Solids		
Foam		
Oil Sheen		
Other		

Sources Checked:

_____
_____
_____
_____

Corrective Action:

_____
_____
_____
_____

Appendix I

Definitions & Acronyms

DEFINITIONS

COMPOSITE SAMPLE- A combination of individual samples collected over a designated period of time.

DAILY MAXIMUM- An effluent limitation that specifies the total mass or average concentration of pollutants that may be discharged in a calendar day.

DEPARTMENT- The department of natural resources. (In some states)

DIRECTOR- The director of the department of natural resources.

ENGINEER- An individual registered as a professional engineer in the state of record.

EPA- The federal environmental protection agency.

FEDERAL CLEAN WATER ACT- The federal water pollution control act. (P.l. 92-500) as amended in 1977, (p.l. 95-217) and in 1981 (p.l. 97-117)

GRAB SAMPLE- Any individual sample collected.

ILLICIT DISCHARGE- Any discharge to a municipal separate storm sewer that is not composed entirely of storm water except discharges.

MONTHLY AVERAGE- The total mass or concentration of all daily discharges sampled during a calendar month divided by the number of daily discharges sampled or measured during that month.

NPDES- The national pollutant discharge elimination system as defined in the federal Clean Water Act.

POINT SOURCE- Any discernible, confined and discrete conveyance including, but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, separate storm sewer or vessel or other floating craft from which pollutants are, or may be, discharged.

POLLUTION- Contamination or other alteration of the physical, chemical or biological properties in any waters of the state, including change in temperature, taste, color, turbidity or odor of the waters, or discharge of any solid, liquid, gas, radioactive or other substance into any waters of the state will or there is reason to believe it will create a nuisance or render the waters harmful, detrimental or injurious to public health, safety or welfare, or to domestic, industrial, agricultural, recreational or other legitimate beneficial uses, or to wild animals, birds, fish or other aquatic life, or which violates, or is reasonably certain to violate, any effluent regulations or limitations or any other standards or limitations adopted by the commission.

RELEASE- To discharge directly or indirectly to waters of the state, or to place, cause or permit to be placed, any water containment in any location where it is reasonably certain to enter waters of the state.

SEPARATE STORM SEWER- Conveyance or systems of conveyances primarily used for conducting and conveying storm water runoff deriving from an urbanized area or designated by the department as a separate storm sewer due to its size, its location, the quantity and nature of pollutants reaching the waters of the states, and other relevant factors.

SEVEN (7)-DAY Q10 STREAM FLOW- The lowest average flow that occurs for seven (7) consecutive days once every ten (10) years.

SIGNIFICANT MATERIALS- Includes, but is not limited to: raw materials, fuels, solvents, detergents, plastic pellets, metallic products, raw materials used in food processing or production, hazardous substances designated under section 101 (14) of CERCLA; any chemical the facility is required to report pursuant to section 313 of title III of SARA; fertilizers; pesticides; and waste products such as ashes, slag and sludge that have the potential to be released with storm water discharges.

STORM WATER- Storm water runoff, snow melt runoff, and surface runoff and drainage.

STORM WATER DISCHARGE ASSOCIATED WITH INDUSTRIAL ACTIVITY- The discharge from any conveyance which is used for collecting and conveying storm water and which is directly related to manufacturing, processing or raw materials storage areas at an industrial plant. The term does not include discharges from facilities or activities excluded from the NPDES program under 40 CFR part 122. For certain categories of industries identified, but is not limited to, storm water discharges from industrial plant yards.

STREAM- A defined watercourse which carries water either continuously or intermittently and which is not entirely confined or located completely upon land owned, leased, or otherwise controlled by one (1) person.

WASTE LOAD ALLOCATION- The amount of pollutants each discharger is allowed by the department to release into a given stream after the department has determined the total amount of pollutants that my be discharged into that stream without endangering its water quality.

WASTEWATER- Water or other liquids which carry or contain pollutants or water contaminants from any source.

WASTEWATER TREATMENT FACILITY- Any facility method or process which removes, reduces or renders less offensive pollutants or water contaminants released from any source.

WATER CONTAMINANT- Any particulate matter or solid matter or liquid or any gas or vapor or any combination thereof, or any temperature change which is in or enters into any waters of the state either directly or indirectly by surface runoff, by sewer, by subsurface seepage or otherwise, which causes or would cause pollution upon entering waters of the state, or which violates or exceeds any of the standards, regulations or limitations under the state clean water law or the federal clean water act or is included in the definition of pollutant in the federal acts.

WATERS OF THE STATE- All rivers, streams, lakes and other bodies of the surface and subsurface water lying within or forming a part of the boundaries of the state which are not entirely confined and located completely upon lands owned, leased or otherwise controlled by a single person or by two or more persons jointly or as tenants in common. These waters also include waters of the United States lying within or adjacent to the state.

WEEKLY DISCHARGE- The total mass or concentration of all daily discharges sampled during any calendar week divided by the number of daily discharges sampled or measured during that week.

ACRONYMS

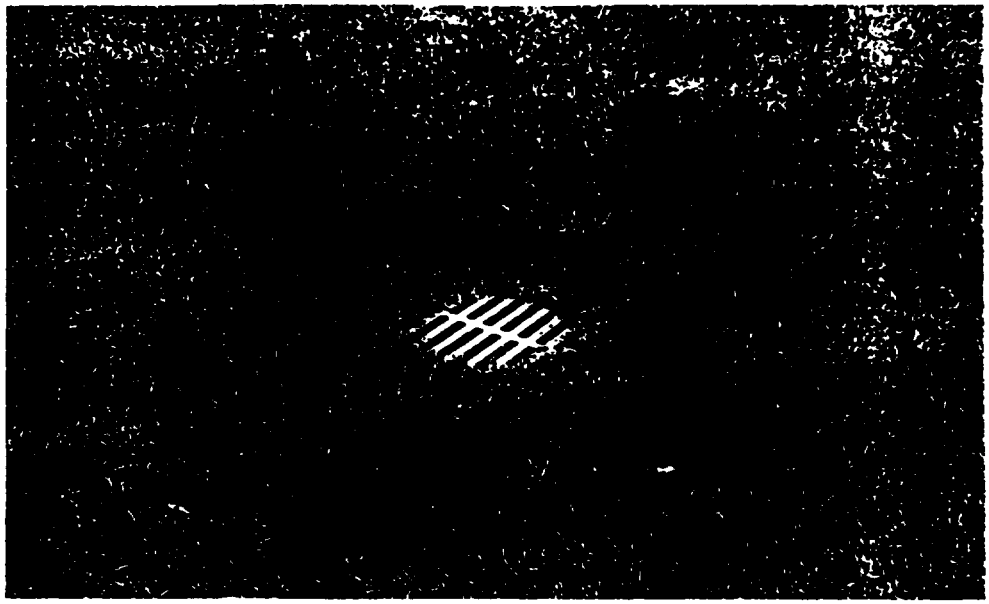
AAR/BOE:	Association of American Railroads/Bureau of Explosives
AIChE:	American Institute of Chemical Engineers
ARCS:	Alternative Remedial Contracting Strategy
ASCS:	Agricultural Stabilization and Conservation Service
ASME:	American Society of Mechanical Engineers
ASSE:	American Society of Safety Engineers
ATSDR:	Agency for Toxic Substances and Disease Registry (HHS)
BAT:	Best Available Technology
BCT:	Best Conventional Pollutant Control Technology
BMPs:	Best Management Practices
CAER:	Community Awareness and Emergency Response (CMA)
CDC:	Centers for Disease Control
CEPP:	Chemical Emergency Preparedness Program
CERCLA:	Comprehensive Environmental Response, Compensation, and Liability Act
CFR:	Code of Federal Regulations
CHEMNET:	Mutual Aid Network of Chemical Shippers and Contractors
CHEMTREC:	Chemical Transportation Emergency Center (800-424-9300)
CHLOREP:	Mutual Aid Group Comprised of Shippers and Carriers of Chlorine
CMA:	Chemical Manufacturer's Association (not a governmental agency)
CPG 1-3:	Federal Assistance Handbook: Emergency Management, Direction and Control Programs
CPG 1-8:	Guide for Development of State and Local Emergency Operations Plans

CPG 1-8A:	Guide for Review of State and Local Emergency Operations Plans
CWA:	Clean Water Act
DNR:	Department of Natural Resources
DOC:	U.S. Department of Commerce
DOD:	U.S. Department of Defense
DOE:	U.S. Department of Energy
DOI:	U.S. Department of the Interior
DOJ:	U.S. Department of Justice
DOL:	U.S. Department of Labor
DOS:	U.S. Department of State
DOT:	U.S. Department of Transportation
DNR:	Department of Natural Resources
EENET:	Emergency Education Network (FEMA)
EMA:	Emergency Management Agency
EMI:	Emergency Management Institute
EOC:	Emergency Operating Center
EOP:	Emergency Operating Plan
EPA:	Environmental Protection Agency
ERD:	Emergency Response Division (EPA)
FEMA:	Federal Emergency Management Agency
FEMA REP 1:	Response Plans and Preparedness in Support of Nuclear Power Plants
FEMA REP-5:	Guidance for Developing State and Local Radiological Emergency Response Plans and Preparedness for Transportation Accidents

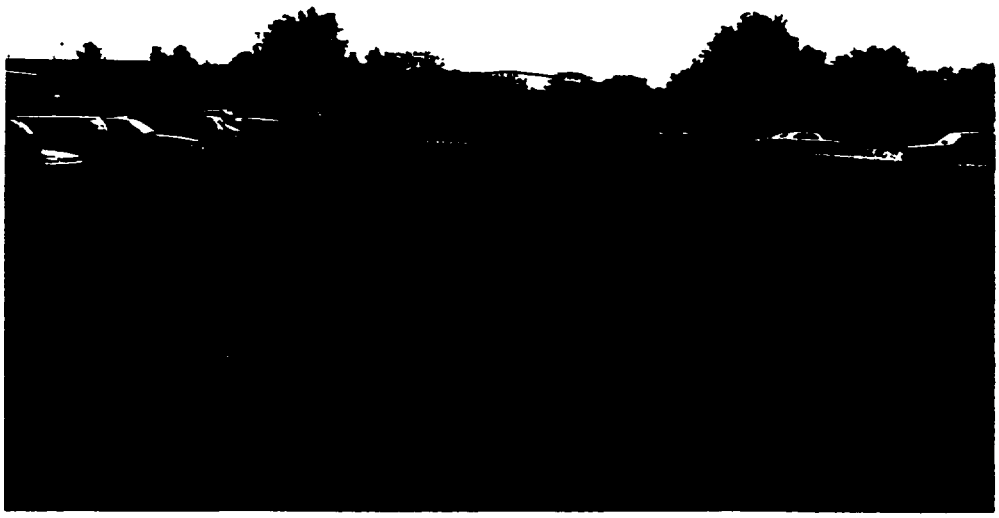
FWPCA:	Federal Water Pollution Control Act
HAZMAT:	Hazardous Materials
HAZOP:	Hazard and Operability Study
HHS:	U.S. Department of Health and Human Services
ICS:	Incident Command System
IEMS:	Integrated Emergency Management System
LEPC:	Local Emergency Planning Committee
MSDS:	Material Safety Data Sheet
NACA:	National Agricultural Chemicals Association
NCP:	National Contingency Plan
NCRIC:	National Chemical Response and Information Center (CMA)
NETC:	National Emergency Training Center
NFA:	National Fire Academy
NFPA:	National Fire Protection Association
NIOSH:	National Institute for Occupational Safety and Health
NOAA:	National Oceanic and Atmospheric Administration
NPDES:	National Pollutant Discharge Elimination System
NRC:	National Response Center (Not to be confused with the Nuclear Regulatory Commission). (800-424-8802) Nuclear Regulatory Commission
NRT:	National Response Team
NUREG 0654/:	Criteria for Preparation and Evaluation of Radiological Emergency

Appendix J

Photographs of Storm Water Outfalls & Material Storage Areas

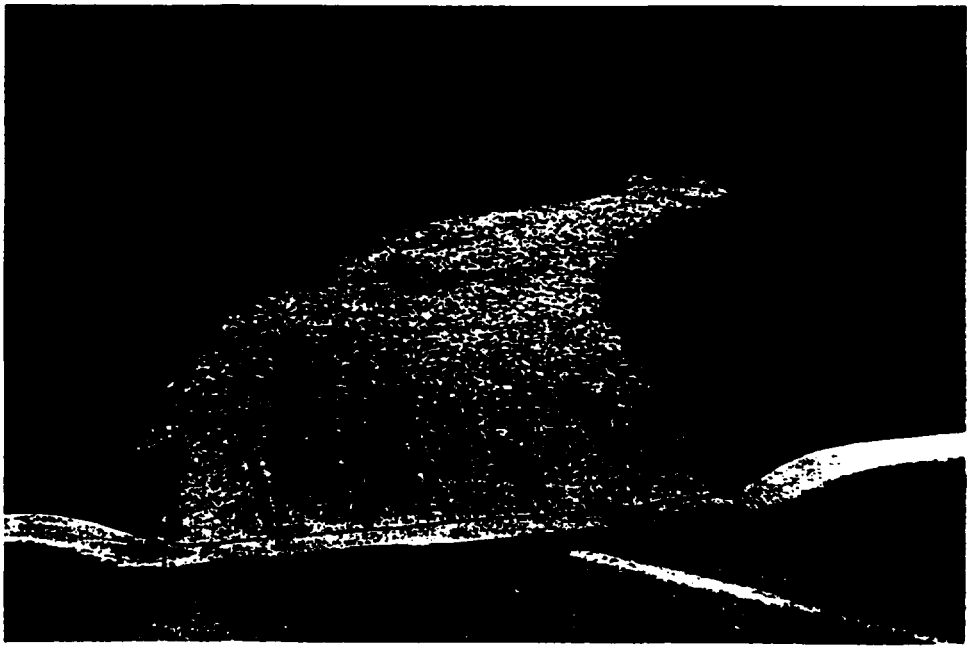


STORM WATER DRAINAGE INLETS: Storm water drainage inlets are located throughout the site. These drainage inlets allow storm water to be drained appropriately and minimize accumulation.



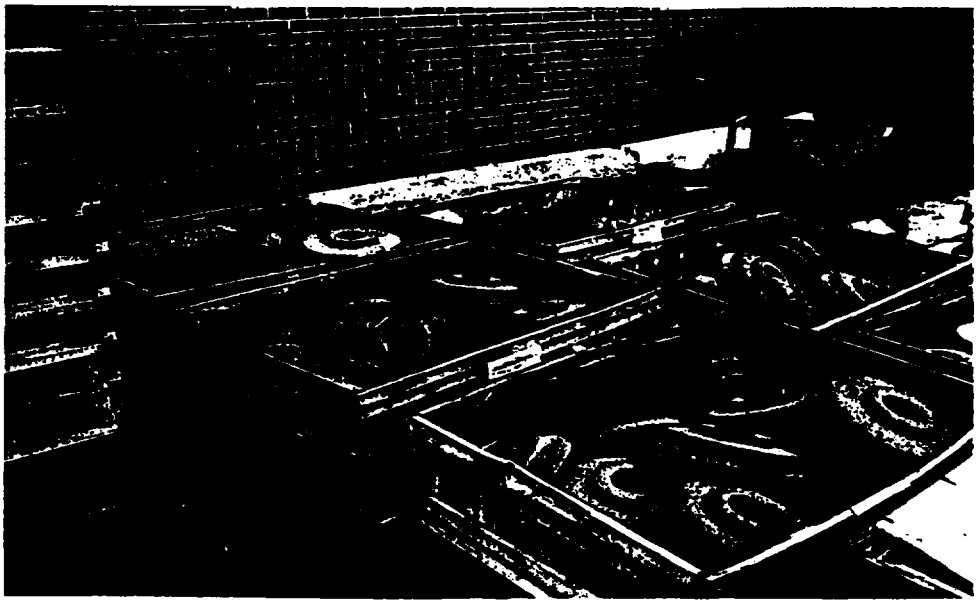
DRAINAGE BASIN: This drainage basin located on the west side of the facility is used to manage storm water. Storm water is collected in the basin and channeled to St. Joseph Creek via storm water conduits.

COVERED SCRAP METAL DUMPSTER: This scrap metal dumpster located just west of Building #2 uses a tarp to prevent storm water accumulation and contamination.



STORM WATER CONTROLS: This gravel drainage area channels water to St. Joseph Creek and minimizes erosion.

PALLETS AND RAW MATERIALS: Pallets and raw materials (iron) are stored outdoors in the storage area on the west side of the site.



RAW MATERIALS (METAL SLUGS): These raw metal components are stored in the outdoor storage area.

INDOOR LOADING AREA: This site utilizes covered loading and unloading areas to minimize storm water contamination potential.

STEEL STORAGE SHED: Drums and containers are stored within this storage shed to prevent spills and leaks and to minimize storm water contamination potential.

Appendix K

ILLINOIS NPDES PERMIT # ILR005775

General NPDES Permit No. ILR00

Illinois Environmental Protection Agency
Division of Water Pollution Control
1021 North Grand East
P.O. Box 19276
Springfield, Illinois 62794-9276

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

General NPDES Permit For Industrial Storm Water

Expiration Date:	May 31, 2003	**Issue Date:**	May 19, 1998
		Effective Date:	June 1, 1998

Discharges authorized by this General Permit: In compliance with the provisions of the Illinois Environmental Protection Act, the Illinois Pollution Control Board Rules and Regulations (35 Ill. Adm. Code, Subtitle C, Chapter 1) and the Clean Water Act, the following discharges may be authorized by this permit in accordance with the conditions herein:

Discharges of storm water associated with industrial activity, as defined and limited herein. Storm water means storm water runoff, snow melt runoff, and surface runoff and drainage.

This general permit regulates only storm water discharges from a facility. Other discharges such as process wastewater or cooling water shall be regulated by other NPDES permits.

Receiving waters: Discharges may be authorized to any surface water of the State.

To receive authorization to discharge under this general permit, a facility operator must either submit an application as described in the permit conditions to the Illinois Environmental Protection Agency or have a valid Illinois General NPDES Permit for industrial storm water. Authorization, if granted, will be by letter and include a copy of this permit.

Thomas G. McSwiggin
Thomas G. McSwiggin, P.E.
Manager, Permit Section
Division of Water Pollution Control

ilr00.wpd

General NPDES Permit No. ILR00

NT TS OF THIS GENERAL PERMIT

A. APPLICABILITY OF THIS GENERAL PERMIT

This permit is applicable to new and existing storm water discharges associated with industrial activity in the State of Illinois from the facilities listed below.

1. Discharges of storm water from facilities whose process wastewater discharges are subject to new source performance standards or toxic pollutant effluent standards under 40 CFR Subchapter N, except:

   a. discharges subject to new source performance standards or toxic pollutant effluent standards and described in paragraph A.8. below which do not have materials or activities exposed to storm water;

   b. discharges subject to storm water effluent limitations guidelines listed in B.1. of this permit.

2. Discharges from manufacturing facilities in the following categories:

SIC 24	(Lumber and wood products except furniture) except SIC 2434 (Wood kitchen cabinets)
SIC 26	(Paper and allied products) except SIC 265 (Paperboard containers and boxes from purchased paperboard) and SIC 267 (Converted paper and paperboard products, except containers and boxes)
SIC 28	(Chemicals and allied products) except SIC 283 (Drugs)
SIC 29	(Petroleum refining and related industries), except discharges subject to 40 CFR 419
SIC 311	(Leather tanning and finishing)
SIC 32	(Stone, clay, glass, and concrete products) except SIC 323 (Glass products made of purchased glass)
SIC 33	(Primary metal industries)
SIC 3441	(Fabricated structural metal)
SIC 373	(Ship and boat building and repairing)

3. Facilities classified as SIC Codes 10-14 (Mineral Industry) including active or inactive mining operations and oil and gas exploration, production, processing, treatment operations, or transmission facilities, except discharges subject to 40 CFR 434, 436, or 440.

4. Landfills, land application sites (excluding land application sites which utilize agricultural land), and open dumps that receive or have received any industrial wastes (waste that is received from any of the facilities described in 40 CFR 122.26(b)(14).

5. Facilities involved in the recycling of materials including metal scrapyards, battery reclaimers, salvage yards, and automobile junkyards including but not limited to SIC 5015 (Used motor vehicle parts) and SIC 5093 (Scrap and waste materials)

6. Transportation facilities-portions of the following facilities involved in vehicle maintenance (including vehicle rehabilitation, mechanical repairs, painting, fueling, and lubrication), equipment cleaning operations, or airport deicing operations:

SIC 40	(Railroad transportation)
SIC 41	(Local and suburban transit and inter-urban highway passenger transportation)

SIC 42	(Motor freight transportation and warehousing) except SIC 4221-4225 (Farm product warehousing and storage, refrigerated warehousing and storage, general warehousing and storage)
SIC 43	(United States Postal Service)
SIC 44	(Water transportation)
SIC 45	(Transportation by air)
SIC 5171	(Petroleum bulk stations and terminals-wholesale)

7. Treatment Works treating domestic sewage that are owned or operated by municipalities with a population of 100,000 people or more or that are privately-owned with a design flow of 1.0 mgd or more; includes sludge or wastewater treatment devices or systems used in the storage, treatment, recycling, and reclamation of municipal or domestic sewage, and land dedicated to sludge disposal located within the confines of the facility; excludes off-site sludge management lands, farm lands, and gardens.

8. Facilities in the following SIC Codes with storm water discharges from areas (except access roads and rail lines) where material handling equipment or activities, raw materials, intermediate products, final products, waste materials, by-products, or industrial machinery are exposed to storm water.

SIC 20	(Food and kindred products manufacturing or processing)
SIC 21	(Tobacco products)
SIC 22	(Textile mill products)
SIC 23	(Apparel and other finished products made from fabrics and similar materials)
SIC 2434	(Wood kitchen cabinets)
SIC 25	(Furniture and fixtures)
SIC 265	(Paperboard containers and boxes)
SIC 267	(Converted paper and paperboard products, except containers and boxes)
SIC 27	(Printing, publishing, and allied industries)
SIC 283	(Drugs)
SIC 285	(Paints, varnishes, lacquers, enamels, and allied products)
SIC 30	(Rubber and miscellaneous plastics products)
SIC 31	(Leather and leather products) except SIC 311 (Leather tanning and finishing)
SIC 323	(Glass products, made of purchased glass)
SIC 34	(Fabricated metal products, except machinery and transportation equipment) except SIC 3441 (Fabricated structural metal)
SIC 35	(Industrial and commercial machinery and computer equipment)
SIC 36	(Electronic and other electrical equipment and components, except computer equipment)
SIC 37	(Transportation equipment) except SIC 373 (Ship and boat building and repairing)
SIC 38	(Measuring, analyzing, and controlling instruments; photographic, medical, and optical goods; watches and clocks)
SIC 39	(Miscellaneous manufacturing industries)
SIC 4221-25	(Farm products warehousing and storage, refrigerated warehousing and storage, general warehousing and storage)

B. TYPES OF DISCHARGES NOT COVERED BY THIS PERMIT

This permit is not applicable to storm water discharges from the following facilities:

1. Discharges subject to storm water effluent limitations guidelines in the following categories:

   Cement Manufacturing (40 CFR 411)
   Feedlots (40 CFR 412)
   Fertilizer Manufacturing (40 CFR 418)
   Petroleum Refining (40 CFR 419)
   Phosphate Manufacturing (40 CFR 422)
   Steam Electric (40 CFR 423)
   Coal Mining (40 CFR 434)
   Mineral Mining and Processing (40 CFR 436)
   Ore Mining and Dressing (40 CFR 440)
   Asphalt Emulsion (40 CFR 443)

2. Hazardous waste treatment, storage or disposal facilities.

3. Steam electric power generating facilities, including coal handling sites.

4. Construction activity including clearing, grading and excavation activities.

5. Storm water discharges associated with industrial activity from facilities with an existing NPDES individual or general permit for the storm water discharges.

6. Storm water discharges associated with industrial activity which are identified by the Agency as possibly causing or contributing to a violation of water quality standards.

7. Storm water discharges associated with inactive mining or inactive oil and gas operations occurring on Federal lands where an operator cannot be identified.

8. Storm water discharges that the Agency determines are not appropriately covered by this general permit.

This permit does not authorize the discharge of hazardous substances or oil resulting from an on-site spill, and does not supercede any reporting requirements for spills or releases of hazardous substances or oil.

C. SPECIAL CONDITIONS

1. Prohibition on non-storm water discharges

   a. Except as provided in C. 1. b. below, all discharges covered by this permit shall be composed entirely of storm water.

   b. i. Except as provided in C. 1 .b. ii. below, discharges of material other than storm water must be in compliance with an NPDES permit (other than this permit) issued for the discharge.

      ii. The following non-storm water discharges may be authorized by this permit provided the non-storm water component of the discharges is in compliance with paragraph E.7. of this permit: discharges from fire fighting activities; fire hydrant flushings; waters used to wash vehicles without the use of detergents or control dust; potable water sources including waterline flushings; irrigation drainages; lawn watering; routine external building washdown which does not use detergents; pavement washwaters where spills or leaks of toxic or hazardous materials have not occurred (unless all spilled material has been removed) and where detergents are not used; air conditioning condensate; springs; uncontaminated ground water; and foundation or footing drains where flows are not contaminated with process materials such as solvents.

D. APPLICATION REQUIREMENTS

1. Dischargers that are covered by a valid Illinois General NPDES Permit for industrial storm water as of September 30, 1997 are automatically covered by this permit unless they request otherwise prior to the effective date of this permit. Other dischargers seeking coverage under this general permit shall provide the Illinois Environmental Protection Agency (IEPA) with the following information:

   a. A completed IEPA Notice of Intent form, accompanied by quantitative sampling data for the storm water discharge(s) if available; or

   b. A completed U.S. EPA Form 1, including Form 2F and quantitative sampling data if available; or

   c. A completed U.S. EPA Notice of Intent form, accompanied by quantitative sampling data for the storm water discharge(s) if available.

2. Quantitative sampling data as required by U.S. EPA Form 2F for storm water discharges from the following facilities is required to be submitted, unless the facility is a participant in a group application accepted by U.S. EPA.

   a. Facilities subject to reporting requirements under Section 313 of EPCRA for chemicals classified as "Section 313 water priority chemicals": Storm water discharges that come into contact with any equipment, tank, container, or other vessel or area used for storage of a Section 313 water priority chemical, or located at a truck or rail car unloading area where a Section 313 water priority chemical is handled.

   b. Facilities classified as SIC 33 (Primary Metal Industries).

   c. Active or inactive landfills, land application sites, or open dumps without a stabilized final cover which have received any industrial wastes.

d. Wood treatment facilities: Storm water discharges from areas that are used for wood treatment, wood surface application, or storage of treated or surface protected wood.

e. Coal pile runoff at industrial facilities other than coal mines.

f. Battery reclaiming facilities: Storm water discharges from areas used for storage of lead acid batteries, reclamation products, or waste products, and areas used for lead acid battery reclamation.

g. Airports with over 50,000 flight operations per year: storm water discharges from aircraft or airport deicing areas.

h. Meat packing plants, poultry packing plants, and facilities that manufacture animal and marine fats and oils.

i. Facilities classified as SIC 28 (Chemicals and Allied Products) and SIC 30 (Rubber and Miscellaneous Plastics Products): Storm water discharges that come into contact with solid chemical storage piles.

j. Automobile junkyards: Storm water discharges exposed to over 250 auto/truck bodies with drivelines, over 250 drivelines, or any combination thereof (in whole or in parts); over 500 auto/truck units (bodies with or without drivelines in whole or in parts); or over 100 units per year are dismantled and drainage or storage of automotive fluids occurs in areas exposed to storm water.

k. Lime manufacturing facilities: Storm water discharges that have come into contact with lime storage piles.

l. Cement manufacturing facilities and cement kilns: Storm water discharges other than those subject to 40 CFR 411.

m. Ready-mixed concrete facilities. Sampling data is not required for new ready-mixed concrete facilities or for relocated ready-mixed concrete facilities.

n. Ship building and repairing facilities.

3. When a facility has two or more outfalls that, based on consideration of features and activities within the area drained by the outfall, the permittee reasonably believes discharge substantially identical effluents, the permittee may sample the effluent of one such outfall and report that quantitative data also applied to the substantially identical outfalls. If the applicant is requesting approval to sample a representative outfall, identification of all storm water outfalls considered to be substantially identical along with the outfall being used to represent such outfalls and appropriate justification must be provided with the application.

4. For existing facilities with an individual NPDES permit covering storm water associated with industrial activity, or those facilities who have previously submitted an application for an individual permit and not yet received a permit, the permittee/applicant may elect to seek coverage under this general permit in place of obtaining an individual permit. To be considered for coverage the permittee/applicant is required to submit the above information following the general permit issue date.

5. For new facilities, the NOI and required information shall be submitted 180 days prior to the date on which the discharge is to commence unless permission for a later date has been granted by the IEPA. Mobile facilities (such as concrete or asphalt batch plants) shall apply at least 30 days prior to discharge.

6. For purposes of the permit an existing facility shall be considered a facility which discharged storm water associated with industrial activity prior to the application deadline set by the U.S. EPA storm water regulations. A new facility is a facility which generates storm water after, but not before the deadline.

7. The required information shall be submitted to the following address:

   Illinois Environmental Protection Agency
   Division of Water Pollution Control
   Permit Section
   Post Office Box 19276
   Springfield, Illinois 62794-9276

8. In any case where an NPDES Permit has been timely applied for but final administrative disposition of such application has not been made, it shall not be a violation of Section 12-F of the Environmental Protection Act to discharge without such permit unless the complainant proves that final administrative disposition has not been made because of the failure of the applicant to furnish information reasonably required or requested in order to process the application. For purposes of this provision, participation in a group application filed with U.S. EPA shall be deemed an application filed with the Agency. This provision does not relieve the applicant from the responsibility for compliance with any other requirement of the Act or regulations promulgated under the Act.

9. Facilities which discharge storm water associated with industrial activity to a municipal separate storm sewer system shall notify the municipality, and shall provide the municipality with a copy of their application if requested.

E. STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

1. A storm water pollution prevention plan shall be developed by the permittee for each facility covered by this permit. The plan shall identify potential sources of pollution which may be expected to affect the quality of storm water discharges associated with the industrial activity at the facility. In addition, the plan shall describe and ensure the implementation of practices which are to be used to reduce the pollutants in storm water discharges associated with industrial activity at the facility and to assure compliance with the terms and conditions of this permit.

2. The plan shall be completed within 180 days of notification by the Agency of coverage by this permit or in the case of new facilities, prior to submitting an NOI to be covered under this permit. Plans shall provide for compliance with the terms of the plan within 365 days of notification by the Agency of coverage by this permit, or in the case of new facilities, prior to submitting an NOI to be covered under this permit. [Note: If the plan has already been required to be developed under a previous permit it shall be maintained in accordance with all requirements of this special condition.]. The owner or operator of a facility with storm water discharges covered by this permit shall make a copy of the plan available to the Agency at any reasonable time upon request.

   Facilities which discharge to a municipal separate storm sewer system shall also make a copy available to the operator of the municipal system at any reasonable time upon request.

3. The permittee may be notified by the Agency at any time that the plan does not meet the requirements of this permit. After such notification, the permittee shall make changes to the plan and shall submit a written certification that the requested changes have been made. Unless otherwise provided, the permittee shall have 30 days after such notification to make the changes.

4. The discharger shall amend the plan whenever there is a change in construction, operation, or maintenance which may affect the discharge of significant quantities of pollutants to the waters of the State or if a facility inspection required by paragraph E.8. of this permit indicates that an amendment is needed. The plan should also be amended if the discharger is in violation of any conditions of this permit, or has not achieved the general objectives of controlling pollutants in storm water discharges. Amendments to the plan shall be made within the shortest reasonable period of time, and shall be provided to the Agency for review upon request.

5. The plan shall provide a description of potential sources which may be expected to add significant quantities of pollutants to storm water discharges, or which may result in non-storm water discharges from the facility. The plan shall include, at a minimum, the following items:

   a. A topographic map extending one-quarter mile beyond the property boundaries of the facility, showing: the facility, surface water bodies, wells (including injection wells), seepage pits, infiltration ponds, and the discharge points where the facility's storm water discharges to a municipal storm drain system or other water body. The requirements of this paragraph may be included on the site map if appropriate.

   b. A site map showing:

      i. The storm water conveyance and discharge structures;

      ii. An outline of the storm water drainage areas for each storm water discharge point;

      iii. Paved areas and buildings;

      iv. Areas used for outdoor manufacturing, storage, or disposal of significant materials, including activities that generate significant quantities of dust or particulates.

      v. Location of existing storm water structural control measures (dikes, coverings, detention facilities, etc.);

      vi. Surface water locations and/or municipal storm drain locations

      vii. Areas of existing and potential soil erosion;

      viii. Vehicle service areas;

ix. Material loading, unloading, and access areas.

c. A narrative description of the following:

i. The nature of the industrial activities conducted at the site, including a description of significant materials that are treated, stored or disposed of in a manner to allow exposure to storm water;

ii. Materials, equipment, and vehicle management practices employed to minimize contact of significant materials with storm water discharges;

iii. Existing structural and non-structural control measures to reduce pollutants in storm water discharges;

iv. Industrial storm water discharge treatment facilities;

v. Methods of onsite storage and disposal of significant materials;

d. A list of the types of pollutants that have a reasonable potential to be present in storm water discharges in significant quantities.

e. An estimate of the size of the facility in acres or square feet, and the percent of the facility that has impervious areas such as pavement or buildings.

f. A summary of existing sampling data describing pollutants in storm water discharges.

6. The plan shall describe the storm water management controls which will be implemented by the facility. The appropriate controls shall reflect identified existing and potential sources of pollutants at the facility. The description of the storm water management controls shall include:

a. Storm Water Pollution Prevention Personnel - Identification by job titles of the individuals who are responsible for developing, implementing, and revising the plan.

b. Preventive Maintenance - Procedures for inspection and maintenance of storm water conveyance system devices such as oil/water separators, catch basins, etc., and inspection and testing of plant equipment and systems that could fail and result in discharges of pollutants to storm water.

c. Good Housekeeping - Good housekeeping requires the maintenance of clean, orderly facility areas that discharge storm water. Material handling areas shall be inspected and cleaned to reduce the potential for pollutants to enter the storm water conveyance system.

d. Spill Prevention and Response - Identification of areas where significant materials can spill into or otherwise enter the storm water conveyance systems and their accompanying drainage points. Specific material handling procedures, storage requirements, spill clean up equipment and procedures should be identified, as appropriate. Internal notification procedures for spills of significant materials should be established.

e. Storm Water Management Practices - Storm water management practices are practices other than those which control the source of pollutants. They include measures such as installing oil and grit separators, diverting storm water into retention basins, etc. Based on assessment of the potential of various sources to contribute pollutants, measures to remove pollutants from storm water discharge shall be implemented. In developing the plan, the following management practices shall be considered:

i. Containment - Storage within berms or other secondary containment devices to prevent leaks and spills from entering storm water runoff;

ii. Oil & Grease Separation - Oil/water separators, booms, skimmers or other methods to minimize oil contaminated storm water discharges;

iii. Debris & Sediment Control - Screens, booms, sediment ponds or other methods to reduce debris and sediment in storm water discharges;

iv. Waste Chemical Disposal - Waste chemicals such as antifreeze, degreasers and used oils shall be recycled or disposed of in an approved manner and in a way which prevents them from entering storm water discharges.

v. Storm Water Diversion - Storm water diversion away from materials manufacturing, storage and other areas of potential storm water contamination;

vi. Covered Storage or Manufacturing Areas - Covered fueling operations, materials manufacturing and storage areas to prevent contact with storm water.

f. Sediment and Erosion Prevention - The plan shall identify areas which due to topography, activities, or other factors, have a high potential for significant soil erosion and describe measures to limit erosion.

g. Employee Training - Employee training programs shall inform personnel at all levels of responsibility of the components and goals of the storm water pollution control plan. Training should address topics such as spill response, good housekeeping and material management practices. The plan shall identify periodic dates for such training.

h. Inspection Procedures - Qualified plant personnel shall be identified to inspect designated equipment and plant areas. A tracking or follow-up procedure shall be used to ensure appropriate response has been taken in response to an inspection. Inspections and maintenance activities shall be documented and recorded.

7. Non-Storm water Discharges - The plan shall include a certification that the discharge has been tested or evaluated for the presence of non-storm water discharges. The certification shall include a description of any tests for the presence of non-storm water discharges, the methods used, the dates of the testing, and any onsite drainage points that were observed during the testing. Any facility that is unable to provide this certification must describe the procedure of any test conducted for the presence of non-storm water discharges, the test results, potential sources of non-storm water discharges to the storm sewer, and why adequate tests for such storm sewers were not feasible. Except as provided in C.1. b., discharges not comprised entirely of storm water are not authorized by this permit.

8. The permittee shall conduct an annual facility inspection to verify that all elements of the plan, including the site map, potential pollutant sources, and structural and non-structural controls to reduce pollutants in industrial storm water discharges are accurate. Observations that require a response and the appropriate response to the observation shall be retained as part of the plan. Records documenting significant observations made during the site inspection shall be submitted to the Agency in accordance with the reporting requirements of this permit.

9. This plan should briefly describe the appropriate elements of other program requirements, including Spill Prevention Control and Countermeasures (SPCC) plans required under Section 311 of the CWA and the regulations promulgated thereunder, and Best Management Programs under 40 CFR 125.100.

10. The plan is considered a report that shall be available to the public under Section 308(b) of the CWA. The permittee may claim portions of the plan as confidential business information, including any portion describing facility security measures.

11. The plan shall include the signature and title of the person responsible for preparation of the plan and include the date of initial preparation and each amendment thereto.

12. Facilities which discharge storm water associated with industrial activity to municipal separate storm sewers may also be subject to additional requirements imposed by the operator of the municipal system.

F. CONSTRUCTION AUTHORIZATION

Authorization is hereby granted to construct treatment works and related equipment that may be required by the Storm Water Pollution Prevention Plan developed pursuant to this permit.

This Authorization is issued subject to the following condition(s).

1. If any statement or representation is found to be incorrect, this authorization may be revoked and the permittee thereupon waives all rights thereunder.

2. The issuance of this authorization (a) does not release the permittee from any liability for damage to persons or property caused by or resulting from the installation, maintenance or operation of the proposed facilities; (b) does not take into consideration the structural stability of any units or part of this project; and (c) does not release the permittee from compliance with other applicable statutes of the State of Illinois, or other applicable local law, regulations or ordinances.

3. When an individual NPDES permit is issued to an owner or operator otherwise subject to this permit, or the owner or operator is approved for coverage under an alternative NPDES general permit, the applicability of this permit to the individual NPDES permittee is automatically terminated on the issue date of the individual permit or the date of approval for coverage under the alternative general permit, whichever the case may be. When an individual NPDES permit is denied to an owner or operator otherwise subject to this permit, or the owner or operator is denied coverage under an alternative NPDES general permit the applicability of this permit to the individual NPDES permitted is automatically terminated on the date of such denial, unless otherwise specified by the Agency.

I. DEFINITIONS

1. Coal pile runoff means the rainfall runoff from or through any coal storage pile.

2. Land application site means an area where wastes are applied onto or incorporated into the soil surface for treatment or disposal

3. Landfill means an area of land or an excavation in which wastes are placed for permanent disposal, and which is not a land application site, surface impoundment, injection well or waste pile.

4. Section 313 water priority chemical means a chemical or chemical categories which: 1) Are listed at 40 CFR 372.65 pursuant to Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA) (also known as Title III of the Superfund Amendments and Reauthorization Act (SARA) of 1986); 2) are present at or above threshold levels at a facility subject to EPCRA Section 313 reporting requirements; and 3) that meet at least one of the following criteria: (i) Are listed in Appendix D of 40 CFR 122 on either Table II (organic priority pollutants), Table III (certain metals, cyanides, and phenols) or Table V (certain toxic pollutants and hazardous substances); (ii) are listed as a hazardous substance pursuant to section 311(b)(2)(A) of the CWA at 40 CFR 116.4; or (iii) are pollutants for which EPA has published acute or chronic water quality criteria.

5. Significant materials includes, but is not limited to: raw materials; fuels; materials such as solvents, detergents, and plastic pellets; finished materials such as metallic products; raw materials used in food processing or production; hazardous substances designated under section 101(14) of CERCLA; any chemical the facility is required to report pursuant to EPCRA Section 313; fertilizers; pesticides; and waste products such as ashes, slag and sludge that have the potential to be released with storm water discharges.

3. Significant spills includes, but is not limited to: releases of oil or hazardous substances in excess of reportable quantities under section 311 of the Clean Water Act (see 40 CFR 110.10 and CFR 117.21) or section 102 of CERCLA (see 40 CFR 302.4).

Note that additional definitions are included in the permit Standard Conditions, Attachment H.

ATTACHMENT H

Standard Conditions

Definitions

Act means the Illinois Environmental Protection Act, Ch. 111 1/2 Ill. Rev. Stat., Sec. 1001-1052 as Amended.

Agency means the Illinois Environmental Protection Agency.

Board means the Illinois Pollution Control Board.

Clean Water Act (formerly referred to as the Federal Water Pollution Control Act) means Pub. L 92-500, as amended. 33 U.S.C. 1251 et seq.

NPDES (National Pollutant Discharge Elimination System) means the national program for issuing, modifying, revoking and reissuing, terminating, monitoring and enforcing permits, and imposing and enforcing pretreatment requirements, under Sections 307, 402, 318 and 405 of the Clean Water Act.

USEPA means the United States Environmental Protection Agency.

Daily Discharge means the discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. For pollutants with limitations expressed in units of mass, the "daily discharge" is calculated as the total mass of the pollutant discharged over the day. For pollutants with limitations expressed in other units of measurements, the "daily discharge" is calculated as the average measurement of the pollutant over the day.

Maximum Daily Discharge Limitation (daily maximum) means the highest allowable daily discharge.

Average Monthly Discharge Limitation (30 day average) means the highest allowable average of daily discharges over a calendar month, calculated as the sum of all daily discharges measured during a calendar month divided by the number of daily discharges measured during that month.

Average Weekly Discharge Limitation (7 day average) means the highest allowable average of daily discharges over a calendar week, calculated as the sum of all daily discharges measured during a calendar week divided by the number of daily discharges measured during that week.

Best Management Practices (BMPs) means schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of waters of the State. BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

Aliquot means a sample of specified volume used to make up a total composite sample.

Grab Sample means an individual sample of at least 100 milliliters collected at a randomly-selected time over a period not exceeding 15 minutes.

24 Hour Composite Sample means a combination of at least 8 sample aliquots of at least 100 milliliters, collected at periodic intervals during the operating hours of a facility over a 24-hour period.

8 Hour Composite Sample means a combination of at least 3 sample aliquots of at least 100 milliliters, collected at periodic intervals during the operating hours of a facility over an 8-hour period.

Flow Proportional Composite Sample means a combination of sample aliquots of at least 100 milliliters collected at periodic intervals such that either the time interval between each aliquot or the volume of each aliquot is proportional to either the stream flow at the time of sampling or the total stream flow since the collection of the previous aliquot.

(1) Duty to comply. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or for denial of a permit renewal application. The permittee shall comply with effluent standards or prohibitions established under Section 307(a) of the Clean Water Act for toxic pollutants within the time provided in the regulations that establish these standards or prohibitions, even if the permit has not yet been modified to incorporate the requirement.

(2) Duty to reapply. If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new permit. If the permittee submits a proper application as required by the Agency no later than 180 days prior to the expiration date, this permit shall continue in full force and effect until the final Agency decision on the application has been made.

(3) Need to halt or reduce activity not a defense. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(4) Duty to mitigate. The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.

(5) Proper operation and maintenance. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up, or auxiliary facilities, or similar systems only when necessary to achieve compliance with the conditions of the permit.

(6) Permit actions. This permit may be modified, revoked and reissued, or terminated for cause by the Agency pursuant to 40 CFR 122.62. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

(7) Property rights. This permit does not convey any property rights of any sort, or any exclusive privilege.

(8) Duty to provide information. The permittee shall furnish to the Agency within a reasonable time, any information which the Agency may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. The permittee shall also furnish to the Agency, upon request, copies of records required to be kept by this permit.

(9) Inspection and entry. The permittee shall allow an authorized representative of the Agency, upon the presentation of credentials and other documents as may be required by law, to:

(a) Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

(d) Sample or monitor at reasonable times, for the purpose of assuring permit compliance, or as otherwise authorized by the Act, any substances or parameters at any location.

(10) Monitoring and records.

(a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.

(b) The permittee shall retain records of all monitoring information, including all calibration and maintenance records, and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of this permit, measurement, report or application. This period may be extended by request of the Agency at any time.

(c) Records of monitoring information shall include:

(1) The date, exact place, and time of sampling or measurements;

(2) The individual(s) who performed the sampling or measurements;

(3) The date(s) analyses were performed;

(4) The individual(s) who performed the analyses;

(5) The analytical techniques or methods used; and

(6) The results of such analyses.

(d) Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit. Where no test procedure under 40 CFR Part 136 has been approved, the permittee must submit to the Agency a test method for approval. The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals to ensure accuracy of measurements.

(11) Signatory requirement. All applications, reports or information submitted to the Agency shall be signed and certified.

(a) Application. All permit applications shall be signed as follows:

(1) For a corporation: by a principal executive officer of at least the level of vice president or a person or position having overall responsibility for environmental matters for the corporation;

(2) For a partnership or sole proprietorship: by a general partner or the proprietor, respectively; or

(3) For a municipality, State, Federal, or other public agency: by either a principal executive officer or ranking elected official.

(b) Reports. All reports required by permits, or other information requested by the Agency shall be signed by a person described in paragraph (a) or by a duly authorized representative of that person. A person is a duly authorized representative only if:

(1) The authorization is made in writing by a person described in paragraph (a); and

(2) The authorization specifies either an individual or a position responsible for the overall operation of the facility, from which the discharge originates, such as a plant manager, superintendent or person of equivalent responsibility; and

(3) The written authorization is submitted to the Agency.

(c) Changes of Authorization. If an authorization under (b) is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of (b) must be submitted to the Agency prior to or together with any reports, information, or applications to be signed by an authorized representative.

(12) Reporting requirements.

(a) Planned changes. The permittee shall give notice to the Agency as soon as possible of any planned physical alterations or additions to the permitted facility.

(b) Anticipated noncompliance. The permittee shall give advance notice to the Agency of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

(c) Compliance schedules. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.

(d) Monitoring reports. Monitoring results shall be reported at the intervals specified elsewhere in this permit.

(1) Monitoring results must be reported on a Discharge Monitoring Report (DMR).

(2) If the permittee monitors any pollutant more frequently than required by the permit, using test procedures approved under 40 CFR 136 or as specified in the permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR.

(3) Calculations for all limitations which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified by the Agency in the permit.

(e) Twenty-four hour reporting. The permittee shall report any noncompliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within 5 days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times; and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance. The following shall be included as information which must be reported within 24 hours.

(1) Any unanticipated bypass which exceeds any effluent limitation in the permit.

(2) Violation of a maximum daily discharge limitation for any of the pollutants listed by the Agency in the permit to be reported within 24 hours.

The Agency may waive the written report on a case-by-case basis if the oral report has been received within 24 hours.

(f) Other noncompliance. The permittee shall report all instances of noncompliance not reported under paragraphs (12)(d), (e), or (g), at the time monitoring reports are submitted. The reports shall contain the information listed in paragraph (12)(e).

(g) Other information. Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application, or in any report to the Agency, it shall promptly submit such facts or information.

(13) Transfer of permits. A permit may be automatically transferred to a new permittee if:

(a) The current permittee notifies the Agency at least 30 days in advance of the proposed transfer date;

(b) The notice includes a written agreement between the existing and new permittees containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittees; and

(c) The Agency does not notify the existing permittee and the proposed new permittee of its intent to modify or revoke and reissue the permit. If this notice is not received, the transfer is effective on the date specified in the agreement.

(14) All manufacturing, commercial, mining, and silvicultural dischargers must notify the Agency as soon as they know or have reason to believe:

(a) That any activity has occurred or will occur which would result in the discharge of any toxic pollutant identified under Section 307 of the Clean Water Act which is not limited in the permit, if that discharge will exceed the highest of the following notification levels:

(1) One hundred micrograms per liter (100 ug/l);

(2) Two hundred micrograms per liter (200 ug/l) for acrolein and acrylonitrile; five hundred micrograms per liter (500 ug/l) for 2,4-dinitrophenol and for 2-methyl-4,6-dinitrophenol; and one milligram per liter (1 mg/l) for antimony;

(3) Five (5) times the maximum concentration value reported for that pollutant in the NPDES permit application; or

(4) The level established by the Agency in this permit.

(b) That they have begun or expect to begin to use or manufacture as an intermediate or final product or byproduct any toxic pollutant which was not reported in the NPDES permit application.

(15) All Publicly Owned Treatment Works (POTWs) must provide adequate notice to the Agency of the following:

(a) Any new introduction of pollutants into that POTW from an indirect discharger which would be subject to Section 301 or 306 of the Clean Water Act if it were directly discharging those pollutants; and

(b) Any substantial change in the volume or character of pollutants being introduced into that POTW by a source introducing pollutants into the POTW at the time of issuance of the permit.

(c) For purposes of this paragraph, adequate notice shall include information on (i) the quality and quantity of effluent introduced into the POTW, and (ii) any anticipated impact of the change on the quantity or quality of effluent to be discharged from the POTW.

(16) If the permit is issued to a publicly owned or publicly regulated treatment works, the permittee shall require any industrial user of such treatment works to comply with federal requirements concerning:

(1) User charges pursuant to Section 204(b) of the Clean Water Act and applicable regulations appearing at 40 CFR 35;

(2) Toxic pollutant effluent standards and pretreatment standards pursuant to Section 307 of the Clean Water Act; and

(3) Inspection, monitoring and entry pursuant to Section 308 of the Clean Water Act.

(17) If an applicable standard or limitation is promulgated under Section 301(b)(2)(C) and (D), 304(b)(2), or 307(a)(2) and that effluent standard or limitation is more stringent than any effluent limitation in the permit, or controls a pollutant not limited in the permit, the permit shall be promptly modified or revoked, and reissued to conform to that effluent standard or limitation.

(18) Any authorization to construct issued to the permittee pursuant to 35 Ill. Adm. Code 309.154 is hereby incorporated by reference as a condition of this permit.

(19) The permittee shall not make any false statement, representation or certification in any application, record, report, plan or other document submitted to the Agency or the USEPA, or required to be maintained under this permit.

(20) The Clean Water Act provides that any person who violates a permit condition implementing Sections 301, 302, 306, 307, 308, 318, or 405 of the Clean Water Act is subject to a civil penalty not to exceed $10,000 per day of such violation. Any person who willfully or negligently violates permit conditions implementing Sections 301, 302, 306, 307, or 308 of the Clean Water Act is subject to a fine of not less than $2,500, nor more than $25,000 per day of violation, or by imprisonment for not more than one year, or both.

(21) The Clean Water Act provides that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under permit shall, upon conviction, be punished by a fine of not more than $10,000 per violation, or by imprisonment for not more than 6 months per violation, or by both.

(22) The Clean Water Act provides that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit shall, including monitoring reports or reports of compliance or non-compliance shall, upon conviction, be punished by a fine of not more than $10,000 per violation, or by imprisonment for not more than 6 months per violation, or by both.

(23) Collected screenings, slurries, sludges, and other solids shall be disposed of in such a manner as to prevent entry of those wastes (or runoff from the wastes) into waters of the State. The proper authorizations for such disposal shall be obtained from the Agency and is incorporated as part hereof by reference.

(24) In case of conflict between these standard conditions and any other conditions included in this permit, the other conditions shall govern.

(25) The permittee shall comply with, in addition to the requirements of the permit, all applicable provisions of 35 Ill. Adm. Code, Subtitle C, Subtitle D, Subtitle E, and all applicable orders of the Board.

(26) The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the remaining provisions of this permit shall continue in full force and effect.

Rev. 12-1-88

VANGUARD
ENVIRONMENTAL, INC.
ENVIRONMENTAL, HEALTH & SAFETY COMPLIANCE SPECIALISTS

Corporate Office
4500 South Garnett, Suite 250 · Tulsa, OK 74146 · Ph. (918) 641-5588 · FAX (918) 641-0617 · www.vanguardenvl.com
Atlanta · Chicago · Cincinnati/Dayton · Dallas/Ft. Worth · Denver · Houston · Kansas City · Los Angeles
Minneapolis/St. Paul · Oklahoma City · Phoenix · St. Louis · Tulsa · Wichita

September 6, 2001

IEPA
Water Pollution Control
Compliance Assurance Section #19
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Ill 62794-9276

Re: Annual Facility Inspection Report
NPDES Permit for Storm Water Discharge

To Whom It May Concern:

Please find the attached Annual Facility Inspection Report for the Arrow Gear facility located at 2301 Curtiss Street, in Downers Grove, Illinois. A comprehensive evaluation of the site and the SWPPP was performed on August 23, 2001. The SWPPP has been updated with only minor changes and enhancements. Should you have questions, comments, or require additional information, please contact Dave Reiss at (630) 969-7640 or me at (918) 641-5588.

Best Regards,

Jason White
Environmental Manager

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
ANNUAL FACILITY INSPECTION REPORT
NPDES PERMIT FOR STORM WATER DISCHARGES
ASSOCIATED WITH INDUSTRIAL SITE ACTIVITIES

Complete each section of this report. Place a NA in sections that do not apply to your operation.

REPORT PERIOD:	FROM 8-22-2000	TO 8-23-2001

OWNER/OPERATOR INFORMATION: (As it appears on the current permit)

NAME: Arrow Gear		TELEPHONE NUMBER: (630) 969-7640
MAILING ADDRESS: 2301 Curtiss Street		
CITY: Downers Grove	STATE: IL	ZIP: 60515
CONTACT PERSON: Dave Reis (Person responsible for Annual Report)		

FACILITY/SITE INFORMATION: (As it appears on the current permit)

FACILITY NAME: Arrow Gear Company		PERMIT NUMBER: ILR 0 0 5 7 7 5
FACILITY LOCATION: 2301 Curtiss Street		
CITY: Downers Grove	STATE: IL	ZIP: 60515-4036
COUNTY: Dupage		PRIMARY SIC CODE: 3566

RECEIVING WATER INFORMATION

STORM SEWER: ☐	OWNER NAME:
WATERS OF THE STATE: ☒	CLOSEST RECEIVING WATERS: St. Joseph Creek

ADDITIONAL INFORMATION

Has this facility received an NPDES Permit under a different own/operator name in the past? If so, list last name permit was issued to: NA
Attach information on any activity that has occurred at this facility during the report period that may have resulted in pollutants discharged to storm water runoff (e.g. Spills). Attach information on any changes to the facility or the activity occurring at the facility that resulted in significant changes to the SWPPP.

SIGNATURE:	DATE:

Retain pink copy,
submit original &
yellow copy to:

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
WATER POLLUTION CONTROL
COMPLIANCE ASSURANCE SECTION #19
1021 NORTH GRAND AVENUE EAST
POST OFFICE BOX 19276
SPRINGFIELD, ILLINOIS 62794-9276

Information required by this form must be provided to comply with 415 ILCS 5/39 (1996). Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

IL 532 2585
WPC 691 MAY-98

NPDES Storm Water Permit
Annual Facility Inspection Report:

A site inspection was performed on 8-23-2001 by Jason White, Environmental Manager with Vanguard Environmental and Dave Reiss, Arrow Gear's Chief Metallurgist. The inspection included a comprehensive evaluation of the site and the associated SWPPP. The inspection yielded no evidence of significant storm water pollutant discharges and confirmed that the SWPPP is being effectively implemented at the facility.